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8 **UNITED STATES DISTRICT COURT**
9 **NORTHERN DISTRICT OF CALIFORNIA**

10
11 ***IN RE: UBER TECHNOLOGIES, INC.***
12 ***PASSENGER SEXUAL ASSAULT***
LITIGATION

Case No. 3:23-md-03084-CRB (LJC)

13 This Document Relates to:

**DECLARATION OF WALT CUBBERLY
IN SUPPORT OF PLAINTIFFS' PORTION
OF THE JOINT LETTER REGARDING
WILLIAMS HART & BOUNDAS
PLAINTIFFS' COMPLAINT WITH 11/18
PFS ORDER**

14 *WHB 1017 v. Uber Technologies, Inc., et al., No.*
15 *3:24-cv-04806*

16 *WHB 1293 v. Uber Technologies, Inc., et al., No.*
17 *3:24-cv-04817*

18 *WHB 1027 v. Uber Technologies, Inc., et al., No.*
19 *3:24-cv-04820*

Judge: Hon. Lisa J. Cisneros
Courtroom: G – 15th Floor

20 *WHB 928 v. Uber Technologies, Inc., et al., No.*
21 *3:24-cv-04825*

22 *WHB 511 v. Uber Technologies, Inc., et al., No.*
23 *3:24-cv-04842*

24 *WHB 860 v. Uber Technologies, Inc., et al., No.*
25 *3:24-cv-04845*

26 *WHB 1123 v. Uber Technologies, Inc., et al., No.*
27 *3:24-cv-04850*

WHB 1023 v. Uber Technologies, Inc., et al., No.
3:24-cv-04877

1 *WHB 1497 v. Uber Technologies, Inc., et al., No.*
2 *3:24-cv-04891*

3 *WHB 700 v. Uber Technologies, Inc., et al., No.*
4 *3:24-cv-04899*

5 *WHB 333 v. Uber Technologies, Inc., et al., No.*
6 *3:24-cv-04905*

7 *WHB 1658 v. Uber Technologies, Inc., et al., No.*
8 *3:24-cv-04907*

9 *WHB 203 v. Uber Technologies, Inc., et al., No.*
10 *3:24-cv-04912*

11 *WHB 1873 v. Uber Technologies, Inc., et al., No.*
12 *3:24-cv-04933*

13 *WHB 1387 v. Uber Technologies, Inc., et al., No.*
14 *3:24-cv-04958*

15 *WHB 1619 v. Uber Technologies, Inc., et al., No.*
16 *3:24-cv-04961*

17 *WHB 689 v. Uber Technologies, Inc., et al., No.*
18 *3:24-cv-04965*

19 *WHB 696 v. Uber Technologies, Inc., et al., No.*
20 *3:24-cv-04979*

21 *WHB 175 v. Uber Technologies, Inc., et al., No.*
22 *3:24-cv-04982*

23 *WHB 1845 v. Uber Technologies, Inc., et al., No.*
24 *3:24-cv-05015*

25 *WHB 676 v. Uber Technologies, Inc., et al., No.*
26 *3:24-cv-05024*

27 *WHB 1269 v. Uber Technologies, Inc., et al., No.*
28 *3:24-cv-05025*

WHB 1900 v. Uber Technologies, Inc., et al., No.
3:24-cv-05031

1 *WHB 1941 v. Uber Technologies, Inc., et al., No.*
2 *3:24-cv-05032*

3 *WHB 1431 v. Uber Technologies, Inc., et al., No.*
4 *3:24-cv-05057*

5 *WHB 12 v. Uber Technologies, Inc., et al., No.*
6 *3:24-cv-05058*

7 *WHB 1919 v. Uber Technologies, Inc., et al., No.*
8 *3:24-cv-05059*

9 *WHB 979 v. Uber Technologies, Inc., et al., No.*
10 *3:24-cv-05082*

11 *WHB 649 v. Uber Technologies, Inc., et al., No.*
12 *3:24-cv-05095*

13 *WHB 666 v. Uber Technologies, Inc., et al., No.*
14 *3:24-cv-05127*

15 *WHB 701 v. Uber Technologies, Inc., et al., No.*
16 *3:24-cv-05138*

17 *WHB 1655 v. Uber Technologies, Inc., et al., No.*
18 *3:24-cv-05223*

19 *WHB 373 v. Uber Technologies, Inc., et al., No.*
20 *3:24-cv-05224*

21 *WHB 428 v. Uber Technologies, Inc., et al., No.*
22 *3:24-cv-05236*

23 *WHB 451 v. Uber Technologies, Inc., et al., No.*
24 *3:24-cv-05256*

25 *WHB 1832 v. Uber Technologies, Inc., et al., No.*
26 *3:24-cv-05305*

27 *WHB 703 v. Uber Technologies, Inc., et al., No.*
28 *3:24-cv-05361*

WHB 1272 v. Uber Technologies, Inc., et al., No.
3:24-cv-05366

1 *WHB 473 v. Uber Technologies, Inc., et al., No.*
2 *3:24-cv-05459*

3 *WHB 1048 v. Uber Technologies, Inc., et al., No.*
4 *3:24-cv-05462*

5 *WHB 1661 v. Uber Technologies, Inc., et al., No.*
6 *3:24-cv-05468*

7 *WHB 1414 v. Uber Technologies, Inc., et al., No.*
8 *3:24-cv-05495*

9 *WHB 1468 v. Uber Technologies, Inc., et al., No.*
10 *3:24-cv-05500*

11 *WHB 1043 v. Uber Technologies, Inc., et al., No.*
12 *3:24-cv-05501*

13 *WHB 1677 v. Uber Technologies, Inc., et al., No.*
14 *3:24-cv-05556*

15 *WHB 1659 v. Uber Technologies, Inc., et al., No.*
16 *3:24-cv-05565*

17 *WHB 981 v. Uber Technologies, Inc., et al., No.*
18 *3:24-cv-05573*

19 *WHB 1552 v. Uber Technologies, Inc., et al., No.*
20 *3:24-cv-05599*

21 *WHB 1381 v. Uber Technologies, Inc., et al., No.*
22 *3:24-cv-05603*

23 *WHB 632 v. Uber Technologies, Inc., et al., No.*
24 *3:24-cv-05604*

25 *WHB 1053 v. Uber Technologies, Inc., et al., No.*
26 *3:24-cv-05612*

27 *WHB 1544 v. Uber Technologies, Inc., et al., No.*
28 *3:24-cv-05622*

WHB 438 v. Uber Technologies, Inc., et al., No.
3:24-cv-05631

1 *WHB 393 v. Uber Technologies, Inc., et al., No.*
2 *3:24-cv-05633*

3 *WHB 349 v. Uber Technologies, Inc., et al., No.*
4 *3:24-cv-05636*

5 *WHB 1611 v. Uber Technologies, Inc., et al., No.*
6 *3:24-cv-05665*

7 *WHB 1416 v. Uber Technologies, Inc., et al., No.*
8 *3:24-cv-05667*

9 *WHB 1348 v. Uber Technologies, Inc., et al., No.*
10 *3:24-cv-05669*

11 *WHB 1843 v. Uber Technologies, Inc., et al., No.*
12 *3:24-cv-05693*

13 *WHB 946 v. Uber Technologies, Inc., et al., No.*
14 *3:24-cv-05698*

15 *WHB 856 v. Uber Technologies, Inc., et al., No.*
16 *3:24-cv-05699*

17 *WHB 1142 v. Uber Technologies, Inc., et al., No.*
18 *3:24-cv-05712*

19 *WHB 1057 v. Uber Technologies, Inc., et al., No.*
20 *3:24-cv-05715*

21 *WHB 1470 v. Uber Technologies, Inc., et al., No.*
22 *3:24-cv-05716*

23 *WHB 871 v. Uber Technologies, Inc., et al., No.*
24 *3:24-cv-05770*

25 *WHB 935 v. Uber Technologies, Inc., et al., No.*
26 *3:24-cv-05776*

27 *WHB 1484 v. Uber Technologies, Inc., et al., No.*
28 *3:24-cv-05779*

WHB 375 v. Uber Technologies, Inc., et al., No.
3:24-cv-05781

1 *WHB 1317 v. Uber Technologies, Inc., et al., No.*
2 *3:24-cv-05791*

3 *WHB 513 v. Uber Technologies, Inc., et al., No.*
4 *3:24-cv-05951*

5 *WHB 991 v. Uber Technologies, Inc., et al., No.*
6 *3:24-cv-05959*

7 *WHB 1556 v. Uber Technologies, Inc., et al., No.*
8 *3:24-cv-05986*

9 *WHB 1999 v. Uber Technologies, Inc., et al., No.*
10 *3:24-cv-07048*

11 I, Walt Cubberly, declare as follows:

- 12 1. My name is Walt Cubberly. I am over 18 years of age, of sound mind, and have
13 personal knowledge of the facts stated in this declaration. I declare under penalty of
14 perjury that the facts stated in this declaration are true and correct.
- 15 2. I am licensed to practice law, and a member of the bar in good standing, in the
16 states of California, Texas, Missouri, and Pennsylvania. I am admitted before the
17 Southern, Central, Eastern, and Northern Districts of California, the Eastern District
of Missouri, the Eastern District of Pennsylvania, the Southern District of Texas,
and the Fifth Circuit Court of Appeals.
- 18 3. I am an associate at the law firm Williams Hart & Boundas, LLP (WHB). My firm
19 and I represent the Plaintiffs in the above-captioned matter.
- 20 4. Attached to this declaration as Exhibit A is a true and correct copy of a letter Uber
21 sent WHB on December 9, 2024 identifying 136 plaintiffs who had not provided
22 verifications to their PFS, 224 plaintiffs had not provided contact information for witnesses,
and 95 plaintiffs had “will supplement” responses in their PFS.
- 23 5. Attached to this declaration as Exhibit B and Exhibit B-1 is a true and correct copy of an email
24 and accompanying table Uber sent to WHB on December 24, 2024 identifying 118 plaintiffs
25 who had not provided verifications to their PFS, 22 who had not provided contact information
26 for witnesses, and 24 plaintiffs who had “will supplement” responses in their PFS.
- 27 6. Attached to this declaration as Exhibit C and Exhibit C-1 is a true and correct copy of an email
28 and accompanying table Uber sent to WHB on January 3, 2025 identifying 127 plaintiffs who

1 had not provided verifications to their PFS, nine who had not provided contact information for
2 witnesses, and seven plaintiffs who had “will supplement” responses in their PFS.

3 7. Attached to this declaration as Exhibit D and Exhibit D-1 is a true and correct copy of an email
4 and accompanying table Uber sent to WHB on January 10, 2025 identifying 82 plaintiffs who
5 had not provided verifications to their PFS, six who had not provided contact information for
6 witnesses, and five plaintiffs who had “will supplement” responses in their PFS.

7 8. Exhibit A attached to the Declaration of Kyle Smith purports to identify 63 plaintiffs who have
8 failed to comply with the November 18 PFS Order. Exhibit A includes the following three
9 cases that are subject to a pending motion in the JCCP: (1) WHB 203, No. 3:24-cv-04912; (2)
10 WHB 451, No. 3:24-cv-05256; and(3) WHB 701, 3:24-cv-05138.

11 9. This declaration was executed in Houston, Texas.

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1 DATED: January 22, 2025

2 WILLIAMS HART & BOUNDAS, LLP

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4 

5
6 Walt Cubberly

7 COUNSEL FOR PLAINTIFFS

EXHIBIT A

PAUL, WEISS, RIFKIND, WHARTON & GARRISON LLP

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December 9, 2024

VIA EMAIL

Walt Cubberly, Esq.
Margret Lecocke, Esq.
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Re: MDL 3084 – Plaintiffs’ Obligations Under Pretrial Order No. 10 and the Court’s
November 18, 2024 Order

Counsel,

We write to discuss Plaintiffs’ obligations under Pretrial Order No. 10 (“PTO 10”) and the Court’s November 18, 2024 Order.

I. The Court’s Orders

PTO 10 requires each Plaintiff to submit a “substantially complete” Plaintiff Fact Sheet (“PFS”). PTO 10 at 6. PTO 10 provides that in order to be “substantially complete,” the PFS must include answers to “all applicable questions” and a “signed Declaration” verifying the PFS. *Id.* Furthermore, the PFS must be accompanied by all “duly executed record release Authorizations” and the production of the “requested documents.” *Id.*

On November 18, 2024, the Court issued an order resolving the parties’ disputes regarding Plaintiffs’ obligations under PTO 10. *See generally* ECF 1877. First, the Court noted that the “parties agree that PFS responses must be verified, but dispute whether Plaintiffs must provide contemporaneous verification of any amendments to their responses.” *Id.* at 2. The Court resolved this dispute by holding that Plaintiffs must contemporaneously verify any amendments to their responses to the PFS’ questions, and that Plaintiffs “shall provide verifications for any currently unverified amendments to PFS responses no later than thirty days from the date of this Order.” *Id.* at 3.

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Regarding Plaintiffs' obligations to provide third-party contact information for certain witnesses in response to questions in the PFS, the Court held that Plaintiffs must "provide contact information for witnesses to the extent such information is known by Plaintiffs and called for by the PFS." *Id.* at 4. "For witnesses who are not represented by counsel, Plaintiffs cannot withhold that contact information by providing counsel's information instead." *Id.* at 4. If a third-party witness is represented by counsel, a Plaintiff may provide counsel's contact information only after "specifically indicat[ing]" that the third-party witness is represented. *Id.* If a Plaintiff believes there are "exceptional circumstances (other than representation by counsel) [that] warrant withholding a witness's contact information, the burden is on that plaintiff to meet and confer with Uber to seek an agreement, or to seek relief from the Court if the parties are not able to agree." *Id.* at 5 (footnote omitted). The Court ordered Plaintiffs to provide amended fact sheets with the required third-party contact information no later than thirty days from the date of the Court's order. *Id.* at 5–6.

Finally, the Court considered Plaintiffs' use of "the phrase 'will supplement' or words to that effect." *Id.* at 6. The Court held that "the questions in the PFS are not optional, and Plaintiffs may not avoid providing information that is available to them through a vague assertion that they will respond later." *Id.* (footnote omitted). Plaintiffs who do so "have violated Judge Breyer's Order requiring a party to '[a]nswer all applicable questions' (even if only to assert that the party does not know the answer), Dkt. No. 348 at 6, as well as the PFS form's requirement—approved by Judge Breyer—that '[e]ach question must be answered in full.'" *Id.* (alterations in original). The Court ordered Plaintiffs to "amend any PFS responses that currently assert only that a plaintiff will supplement the response" no later than 30 days from the date of the Court's order. *Id.* at 7.

II. Compliance with the Court's November 18 Order

The following Plaintiffs represented by your firm have failed to provide signed verifications supporting their responses to the PFS' questions:

1. WHB 1882, No. 3:24-cv-04813, MDLC ID 1531 (unverified original PFS)
2. WHB 1027, No. 3:24-cv-04820, MDLC ID 1533 (unverified amended PFS)
3. WHB 928, No. 3:24-cv-04825, MDLC ID 1535 (unverified amended PFS)
4. WHB 1682, No. 3:24-cv-04835, MDLC ID 1540 (unverified original PFS)
5. WHB 531, No. 3:24-cv-04846, MDLC ID 1543 (unverified original PFS)
6. WHB 1341, No. 3:24-cv-04839, MDLC ID 1547 (unverified amended PFS)
7. WHB 860, No. 3:24-cv-04845, MDLC ID 1549 (unverified original PFS)
8. WHB 682, No. 3:24-cv-04805, MDLC ID 1550 (unverified amended PFS)
9. WHB 511, No. 3:24-cv-04842, MDLC ID 1551 (unverified amended PFS)
10. WHB 1023, No. 3:24-cv-04877, MDLC ID 1563 (unverified amended PFS)
11. WHB 195, No. 3:24-cv-04802, MDLC ID 1582 (unverified amended PFS)
12. WHB 1017, No. 3:24-cv-04806, MDLC ID 1583 (unverified original PFS)
13. WHB 1293, No. 3:24-cv-04817, MDLC ID 1593 (unverified amended PFS)
14. WHB 600, No. 3:24-cv-04941, MDLC ID 1594 (unverified original PFS)
15. WHB 333, No. 3:24-cv-04905, MDLC ID 1595 (unverified original PFS)
16. WHB 1658, No. 3:24-cv-04907, MDLC ID 1597 (unverified original PFS)
17. WHB 56, No. 3:24-cv-04908, MDLC ID 1598 (unverified original PFS)
18. WHB 317, No. 3:24-cv-04853, MDLC ID 1604 (unverified amended PFS)

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19. WHB 1948, No. 3:24-cv-04880, MDLC ID 1606 (unverified original PFS)
20. WHB 700, No. 3:24-cv-04899, MDLC ID 1612 (unverified amended PFS)
21. WHB 526, No. 3:24-cv-04901, MDLC ID 1614 (unverified original PFS)
22. WHB 310, No. 3:24-cv-04903, MDLC ID 1616 (unverified original PFS)
23. WHB 1002, No. 3:24-cv-04885, MDLC ID 1627 (unverified original PFS)
24. WHB 203, No. 3:24-cv-04912, MDLC ID 1630 (unverified original PFS)
25. WHB 689, No. 3:24-cv-04965, MDLC ID 1631 (unverified amended PFS)
26. WHB 1497, No. 3:24-cv-04891, MDLC ID 1632 (unverified original PFS)
27. WHB 603, No. 3:24-cv-04971, MDLC ID 1633 (unverified original PFS)
28. WHB 1387, No. 3:24-cv-04958, MDLC ID 1635 (unverified original PFS)
29. WHB 1896, No. 3:24-cv-04975, MDLC ID 1638 (unverified original PFS)
30. WHB 1422, No. 3:24-cv-04925, MDLC ID 1648 (unverified amended PFS)
31. WHB 1853, No. 3:24-cv-04938, MDLC ID 1651 (unverified amended PFS)
32. WHB 1960, No. 3:24-cv-04960, MDLC ID 1655 (unverified amended PFS)
33. WHB 1123, No. 3:24-cv-04850, MDLC ID 1659 (unverified original PFS)
34. WHB 1873, No. 3:24-cv-04933, MDLC ID 1682 (unverified amended PFS)
35. WHB 1619, No. 3:24-cv-04961, MDLC ID 1690 (unverified original PFS)
36. WHB 696, No. 3:24-cv-04979, MDLC ID 1695 (unverified original PFS)
37. WHB 175, No. 3:24-cv-04982, MDLC ID 1697 (unverified amended PFS)
38. WHB 859, No. 3:24-cv-04934, MDLC ID 1701 (unverified original PFS)
39. WHB 1345, No. 3:24-cv-05008, MDLC ID 1706 (unverified original PFS)
40. WHB 1908, No. 3:24-cv-05050, MDLC ID 1708 (unverified second amended PFS)
41. WHB 530, No. 3:24-cv-05091, MDLC ID 1711 (unverified original PFS)
42. WHB 178, No. 3:24-cv-05098, MDLC ID 1713 (unverified amended PFS)
43. WHB 1489, No. 3:24-cv-05093, MDLC ID 1715 (unverified original PFS)
44. WHB 1845, No. 3:24-cv-05015, MDLC ID 1725 (unverified original PFS)
45. WHB 1900, No. 3:24-cv-05031, MDLC ID 1726 (unverified original PFS)
46. WHB 1007, No. 3:24-cv-05023, MDLC ID 1731 (unverified original PFS)
47. WHB 1269, No. 3:24-cv-05025, MDLC ID 1732 (unverified original PFS)
48. WHB 676, No. 3:24-cv-05024, MDLC ID 1734 (unverified original PFS)
49. WHB 1941, No. 3:24-cv-05032, MDLC ID 1739 (unverified original PFS)
50. WHB 1837, No. 3:24-cv-05033, MDLC ID 1747 (unverified original PFS)
51. WHB 999, No. 3:24-cv-05036, MDLC ID 1748 (unverified original PFS)
52. WHB 1606, No. 3:24-cv-05066, MDLC ID 1757 (unverified original PFS)
53. WHB 1431, No. 3:24-cv-05057, MDLC ID 1759 (unverified original PFS)
54. WHB 12, No. 3:24-cv-05058, MDLC ID 1760 (unverified original PFS)
55. WHB 1919, No. 3:24-cv-05059, MDLC ID 1761 (unverified original PFS)
56. WHB 599, No. 3:24-cv-05062, MDLC ID 1764 (unverified original PFS)
57. WHB 979, No. 3:24-cv-05082, MDLC ID 1770 (unverified original PFS)
58. WHB 666, No. 3:24-cv-05127, MDLC ID 1788 (unverified original PFS)
59. WHB 504, No. 3:24-cv-05243, MDLC ID 1838 (unverified original PFS)
60. WHB 823, No. 3:24-cv-05041, MDLC ID 1845 (unverified original PFS)
61. WHB 931, No. 3:24-cv-05130, MDLC ID 1865 (unverified original PFS)
62. WHB 427, No. 3:24-cv-05132, MDLC ID 1866 (unverified original PFS)
63. WHB 1425, No. 3:24-cv-05129, MDLC ID 1868 (unverified original PFS)
64. WHB 638, No. 3:24-cv-05116, MDLC ID 1874 (unverified original PFS)

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65. WHB 1610, No. 3:24-cv-05118, MDLC ID 1875 (unverified original PFS)
66. WHB 1386, No. 3:24-cv-05128, MDLC ID 1878 (unverified original PFS)
67. WHB 510, No. 3:24-cv-05278, MDLC ID 1879 (unverified original PFS)
68. WHB 1832, No. 3:24-cv-05305, MDLC ID 1893 (unverified original PFS)
69. WHB 451, No. 3:24-cv-05256, MDLC ID 1897 (unverified original PFS)
70. WHB 70, No. 3:24-cv-05261, MDLC ID 1899 (unverified second amended PFS)
71. WHB 373, No. 3:24-cv-05224, MDLC ID 1910 (unverified original PFS)
72. WHB 428, No. 3:24-cv-05236, MDLC ID 1917 (unverified original PFS)
73. WHB 1962, No. 3:24-cv-05240, MDLC ID 1918 (unverified original PFS)
74. WHB 1024, No. 3:24-cv-05258, MDLC ID 1921 (unverified original PFS)
75. WHB 703, No. 3:24-cv-05361, MDLC ID 1925 (unverified original PFS)
76. WHB 1272, No. 3:24-cv-05366, MDLC ID 1926 (unverified original PFS)
77. WHB 873, No. 3:24-cv-05351, MDLC ID 1931 (unverified original PFS)
78. WHB 662, No. 3:24-cv-05355, MDLC ID 1940 (unverified original PFS)
79. WHB 1048, No. 3:24-cv-05462, MDLC ID 1943 (unverified original PFS)
80. WHB 1021, No. 3:24-cv-05466, MDLC ID 1947 (unverified amended PFS)
81. WHB 1661, No. 3:24-cv-05468, MDLC ID 1948 (unverified original PFS)
82. WHB 1443, No. 3:24-cv-05472, MDLC ID 1950 (unverified amended PFS)
83. WHB 58, No. 3:24-cv-05477, MDLC ID 1953 (unverified amended PFS)
84. WHB 1540, No. 3:24-cv-05449, MDLC ID 1959 (unverified amended PFS)
85. WHB 981, No. 3:24-cv-05573, MDLC ID 1967 (unverified original PFS)
86. WHB 1457, No. 3:24-cv-05576, MDLC ID 1971 (unverified amended PFS)
87. WHB 1043, No. 3:24-cv-05501, MDLC ID 1972 (unverified second amended PFS)
88. WHB 1338, No. 3:24-cv-05434, MDLC ID 1974 (unverified original PFS)
89. WHB 473, No. 3:24-cv-05459, MDLC ID 1980 (unverified original PFS)
90. WHB 406, No. 3:24-cv-05560, MDLC ID 1985 (unverified original PFS)
91. WHB 1414, No. 3:24-cv-05495, MDLC ID 1988 (unverified original PFS)
92. WHB 1468, No. 3:24-cv-05500, MDLC ID 1989 (unverified original PFS)
93. WHB 1324, No. 3:24-cv-05561, MDLC ID 2055 (unverified amended PFS)
94. WHB 1677, No. 3:24-cv-05556, MDLC ID 2057 (unverified original PFS)
95. WHB 1860, No. 3:24-cv-05568, MDLC ID 2061 (unverified original PFS)
96. WHB 935, No. 3:24-cv-05776, MDLC ID 2065 (unverified original PFS)
97. WHB 1484, No. 3:24-cv-05779, MDLC ID 2066 (unverified original PFS)
98. WHB 375, No. 3:24-cv-05781, MDLC ID 2067 (unverified original PFS)
99. WHB 1659, No. 3:24-cv-05565, MDLC ID 2070 (unverified amended PFS)
100. WHB 498, No. 3:24-cv-05769, MDLC ID 2074 (unverified original PFS)
101. WHB 678, No. 3:24-cv-05961, MDLC ID 2078 (unverified original PFS)
102. WHB 1381, No. 3:24-cv-05603, MDLC ID 2133 (unverified original PFS)
103. WHB 632, No. 3:24-cv-05604, MDLC ID 2134 (unverified amended PFS)
104. WHB 517, No. 3:24-cv-05608, MDLC ID 2135 (unverified original PFS)
105. WHB 339, No. 3:24-cv-05614, MDLC ID 2141 (unverified original PFS)
106. WHB 1544, No. 3:24-cv-05622, MDLC ID 2146 (unverified original PFS)
107. WHB 438, No. 3:24-cv-05631, MDLC ID 2148 (unverified original PFS)
108. WHB 393, No. 3:24-cv-05633, MDLC ID 2150 (unverified original PFS)
109. WHB 338, No. 3:24-cv-05635, MDLC ID 2151 (unverified original PFS)
110. WHB 349, No. 3:24-cv-05636, MDLC ID 2152 (unverified original PFS)

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111. WHB 1552, No. 3:24-cv-05599, MDLC ID 2158 (unverified original PFS)
112. WHB 465, No. 3:24-cv-05617, MDLC ID 2162 (unverified amended PFS)
113. WHB 1348, No. 3:24-cv-05669, MDLC ID 2174 (unverified original PFS)
114. WHB 1332, No. 3:24-cv-05670, MDLC ID 2175 (unverified original PFS)
115. WHB 1611, No. 3:24-cv-05665, MDLC ID 2176 (unverified original PFS)
116. WHB 891, No. 3:24-cv-05666, MDLC ID 2178 (unverified original PFS)
117. WHB 435, No. 3:24-cv-05668, MDLC ID 2179 (unverified amended PFS)
118. WHB 1556, No. 3:24-cv-05986, MDLC ID 2180 (unverified original PFS)
119. WHB 1947, No. 3:24-cv-05714, MDLC ID 2183 (unverified original PFS)
120. WHB 946, No. 3:24-cv-05698, MDLC ID 2184 (unverified original PFS)
121. WHB 505, No. 3:24-cv-05709, MDLC ID 2186 (unverified original PFS)
122. WHB 1142, No. 3:24-cv-05712, MDLC ID 2187 (unverified original PFS)
123. WHB 1057, No. 3:24-cv-05715, MDLC ID 2189 (unverified original PFS)
124. WHB 1470, No. 3:24-cv-05716, MDLC ID 2190 (unverified original PFS)
125. WHB 1843, No. 3:24-cv-05693, MDLC ID 2193 (unverified original PFS)
126. WHB 856, No. 3:24-cv-05699, MDLC ID 2194 (unverified original PFS)
127. WHB 1398, No. 3:24-cv-05705, MDLC ID 2195 (unverified original PFS)
128. WHB 871, No. 3:24-cv-05770, MDLC ID 2196 (unverified original PFS)
129. WHB 413, No. 3:24-cv-05782, MDLC ID 2198 (unverified original PFS)
130. WHB 1317, No. 3:24-cv-05791, MDLC ID 2199 (unverified original PFS)
131. WHB 1481, No. 3:24-cv-05794, MDLC ID 2201 (unverified original PFS)
132. WHB 991, No. 3:24-cv-05959, MDLC ID 2206 (unverified original PFS)
133. WHB 884, No. 3:24-cv-05948, MDLC ID 2207 (unverified original PFS)
134. WHB 513, No. 3:24-cv-05951, MDLC ID 2208 (unverified original PFS)
135. WHB 1999, No. 3:24-cv-07048, MDLC ID 2629 (unverified original PFS)
136. WHB 2000, No. 3:24-cv-07183, MDLC ID 2630 (unverified original PFS)

The following Plaintiffs represented by your firm have withheld third-party contact information requested by Questions 23.a, 26.c, 27.b, or 30.a by either providing counsel's contact information without specifically indicating the third party is represented or by failing to answer these questions in full:

1. Jane Doe F-2, No. 3:23-cv-03949, MDLC ID 1044 (Question 30.a)
2. WHB 1966, No. 3:24-cv-04546, MDLC ID 1479 (Question 30.a)
3. WHB 1841, No. 3:24-cv-04799, MDLC ID 1521 (Question 30.a)
4. WHB 1608, No. 3:24-cv-04795, MDLC ID 1522 (Questions 23.a and 30.a)
5. WHB 1444, No. 3:24-cv-04804, MDLC ID 1527 (Question 30.a)
6. WHB 1557, No. 3:24-cv-04798, MDLC ID 1528 (Question 30.a)
7. WHB 1486, No. 3:24-cv-04803, MDLC ID 1529 (Questions 23.a and 30.a)
8. WHB 1882, No. 3:24-cv-04813, MDLC ID 1531 (Question 30.a)
9. WHB 1912, No. 3:24-cv-04827, MDLC ID 1536 (Question 30.a)
10. WHB 621, No. 3:24-cv-04832, MDLC ID 1538 (Question 30.a)
11. WHB 188, No. 3:24-cv-04834, MDLC ID 1539 (Question 30.a)
12. WHB 1682, No. 3:24-cv-04835, MDLC ID 1540 (Questions 23.a and 30.a)
13. WHB 397, No. 3:24-cv-04838, MDLC ID 1541 (Question 30.a)
14. WHB 1545, No. 3:24-cv-04844, MDLC ID 1542 (Question 30.a)
15. WHB 531, No. 3:24-cv-04846, MDLC ID 1543 (Question 30.a)

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16. WHB 191, No. 3:24-cv-04847, MDLC ID 1544 (Question 30.a)
17. WHB 1478, No. 3:24-cv-04833, MDLC ID 1546 (Question 30.a)
18. WHB 1341, No. 3:24-cv-04839, MDLC ID 1547 (Question 30.a)
19. WHB 622, No. 3:24-cv-04836, MDLC ID 1552 (Question 30.a)
20. WHB 1901, No. 3:24-cv-04815, MDLC ID 1553 (Question 30.a)
21. WHB 1539, No. 3:24-cv-04864, MDLC ID 1558 (Question 30.a)
22. WHB 601, No. 3:24-cv-04882, MDLC ID 1562 (Question 30.a)
23. WHB 199, No. 3:24-cv-04870, MDLC ID 1570 (Question 30.a)
24. WHB 1030, No. 3:24-cv-04874, MDLC ID 1571 (Question 30.a)
25. WHB 196, No. 3:24-cv-04886, MDLC ID 1573 (Question 30.a)
26. WHB 1463, No. 3:24-cv-04855, MDLC ID 1576 (Question 30.a)
27. WHB 1017, No. 3:24-cv-04806, MDLC ID 1583 (Question 30.a)
28. WHB 1399, No. 3:24-cv-04811, MDLC ID 1585 (Question 30.a)
29. WHB 1835, No. 3:24-cv-04824, MDLC ID 1590 (Questions 26.c and 30.a)
30. WHB 318, No. 3:24-cv-04889, MDLC ID 1591 (Question 30.a)
31. WHB 341, No. 3:24-cv-04892, MDLC ID 1592 (Question 30.a)
32. WHB 317, No. 3:24-cv-04853, MDLC ID 1604 (Question 30.a)
33. WHB 1914, No. 3:24-cv-04869, MDLC ID 1605 (Question 30.a)
34. WHB 1948, No. 3:24-cv-04880, MDLC ID 1606 (Question 30.a)
35. WHB 1590, No. 3:24-cv-04946, MDLC ID 1607 (Question 30.a)
36. WHB 1951, No. 3:24-cv-04895, MDLC ID 1609 (Questions 23.a and 30.a)
37. WHB 832, No. 3:24-cv-04900, MDLC ID 1613 (Question 30.a)
38. WHB 526, No. 3:24-cv-04901, MDLC ID 1614 (Question 30.a)
39. WHB 310, No. 3:24-cv-04903, MDLC ID 1616 (Question 30.a)
40. WHB 854, No. 3:24-cv-04873, MDLC ID 1625 (Question 30.a)
41. WHB 1002, No. 3:24-cv-04885, MDLC ID 1627 (Question 30.a)
42. WHB 203, No. 3:24-cv-04912, MDLC ID 1630 (Question 30.a)
43. WHB 1497, No. 3:24-cv-04891, MDLC ID 1632 (Question 30.a)
44. WHB 603, No. 3:24-cv-04971, MDLC ID 1633 (Question 30.a)
45. WHB 1896, No. 3:24-cv-04975, MDLC ID 1638 (Question 30.a)
46. WHB 1903, No. 3:24-cv-04981, MDLC ID 1642 (Question 30.a)
47. WHB 1623, No. 3:24-cv-04986, MDLC ID 1646 (Question 30.a)
48. WHB 200, No. 3:24-cv-04988, MDLC ID 1647 (Question 30.a)
49. WHB 1422, No. 3:24-cv-04925, MDLC ID 1648 (Question 30.a)
50. WHB 312, No. 3:24-cv-04928, MDLC ID 1649 (Question 30.a)
51. WHB 1853, No. 3:24-cv-04938, MDLC ID 1651 (Question 30.a)
52. WHB 756, No. 3:24-cv-04942, MDLC ID 1652 (Question 30.a)
53. WHB 1936, No. 3:24-cv-04950, MDLC ID 1653 (Question 30.a)
54. WHB 1857, No. 3:24-cv-04955, MDLC ID 1654 (Question 30.a)
55. WHB 1960, No. 3:24-cv-04960, MDLC ID 1655 (Question 30.a)
56. WHB 950, No. 3:24-cv-04931, MDLC ID 1681 (Question 30.a)
57. WHB 1462, No. 3:24-cv-04935, MDLC ID 1683 (Question 30.a)
58. WHB 1531, No. 3:24-cv-04937, MDLC ID 1684 (Questions 23.a and 30.a)
59. WHB 1670, No. 3:24-cv-04949, MDLC ID 1685 (Question 30.a)
60. WHB 1946, No. 3:24-cv-04952, MDLC ID 1686 (Question 30.a)
61. WHB 1667, No. 3:24-cv-04957, MDLC ID 1688 (Question 30.a)

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62. WHB 1546, No. 3:24-cv-04969, MDLC ID 1689 (Question 30.a)
63. WHB 1619, No. 3:24-cv-04961, MDLC ID 1690 (Question 30.a)
64. WHB 1551, No. 3:24-cv-04940, MDLC ID 1691 (Questions 27.b and 30.a)
65. WHB 1847, No. 3:24-cv-04945, MDLC ID 1693 (Question 30.a)
66. WHB 974, No. 3:24-cv-04977, MDLC ID 1694 (Question 30.a)
67. WHB 696, No. 3:24-cv-04979, MDLC ID 1695 (Question 30.a)
68. WHB 175, No. 3:24-cv-04982, MDLC ID 1697 (Questions 23.a and 30.a)
69. WHB 179, No. 3:24-cv-04921, MDLC ID 1698 (Question 30.a)
70. WHB 202, No. 3:24-cv-04930, MDLC ID 1700 (Question 30.a)
71. WHB 1916, No. 3:24-cv-05003, MDLC ID 1702 (Question 30.a)
72. WHB 628, No. 3:24-cv-05006, MDLC ID 1705 (Question 30.a)
73. WHB 1345, No. 3:24-cv-05008, MDLC ID 1706 (Question 30.a)
74. WHB 1890, No. 3:24-cv-05048, MDLC ID 1707 (Question 30.a)
75. WHB 1908, No. 3:24-cv-05050, MDLC ID 1708 (Question 30.a)
76. WHB 1663, No. 3:24-cv-05092, MDLC ID 1709 (Question 30.a)
77. WHB 984, No. 3:24-cv-05086, MDLC ID 1710 (Question 30.a)
78. WHB 649, No. 3:24-cv-05095, MDLC ID 1712 (Question 30.a)
79. WHB 178, No. 3:24-cv-05098, MDLC ID 1713 (Question 30.a)
80. WHB 1447, No. 3:24-cv-05090, MDLC ID 1714 (Question 30.a)
81. WHB 1489, No. 3:24-cv-05093, MDLC ID 1715 (Question 30.a)
82. WHB 754, No. 3:24-cv-05096, MDLC ID 1716 (Question 30.a)
83. WHB 862, No. 3:24-cv-05097, MDLC ID 1717 (Question 30.a)
84. WHB 361, No. 3:24-cv-05009, MDLC ID 1718 (Question 30.a)
85. WHB 1889, No. 3:24-cv-05011, MDLC ID 1720 (Question 30.a)
86. WHB 1607, No. 3:24-cv-05014, MDLC ID 1724 (Question 30.a)
87. WHB 1845, No. 3:24-cv-05015, MDLC ID 1725 (Question 30.a)
88. WHB 400, No. 3:24-cv-05034, MDLC ID 1727 (Question 30.a)
89. WHB 1007, No. 3:24-cv-05023, MDLC ID 1731 (Question 30.a)
90. WHB 1941, No. 3:24-cv05032, MDLC ID 1739 (Question 30.a)
91. WHB 762, No. 3:24-cv-05035, MDLC ID 1740 (Question 30.a)
92. WHB 1837, No. 3:24-cv-05033, MDLC ID 1747 (Question 30.a)
93. WHB 999, No. 3:24-cv-05036, MDLC ID 1748 (Question 30.a)
94. WHB 1871, No. 3:24-cv-05052, MDLC ID 1750 (Question 30.a)
95. WHB 1606, No. 3:24-cv-05066, MDLC ID 1757 (Question 30.a)
96. WHB 1431, No. 3:24-cv-05057, MDLC ID 1759 (Question 30.a)
97. WHB 12, No. 3:24-cv-05058, MDLC ID 1760 (Question 30.a)
98. WHB 1919, No. 3:24-cv-05059, MDLC ID 1761 (Question 30.a)
99. WHB 3, No. 3:24-cv-05061, MDLC ID 1763 (Question 30.a)
100. WHB 599, No. 3:24-cv-05062, MDLC ID 1764 (Question 30.a)
101. WHB 1953, No. 3:24-cv-05085, MDLC ID 1765 (Question 30.a)
102. WHB 1865, No. 3:24-cv-05089, MDLC ID 1767 (Question 30.a)
103. WHB 1967, No. 3:24-cv-05094, MDLC ID 1768 (Question 30.a)
104. WHB 979, No. 3:24-cv-05082, MDLC ID 1770 (Question 30.a)
105. WHB 666, No. 3:24-cv-05127, MDLC ID 1788 (Question 30.a)
106. WHB 466, No. 3:24-cv-05265, MDLC ID 1807 (Questions 26.c and 30.a)
107. WHB 1394, No. 3:24-cv-05237, MDLC ID 1836 (Question 30.a)

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108. WHB 504, No. 3:24-cv-05243, MDLC ID 1838 (Question 30.a)
109. WHB 1406, No. 3:24-cv-05249, MDLC ID 1839 (Question 30.a)
110. WHB 823, No. 3:24-cv-05041, MDLC ID 1845 (Question 30.a)
111. WHB 1859, No. 3:24-cv-05126, MDLC ID 1855 (Question 30.a)
112. WHB 1915, No. 3:24-cv-05133, MDLC ID 1857 (Question 30.a)
113. WHB 1409, No. 3:24-cv-05122, MDLC ID 1863 (Question 30.a)
114. WHB 1839, No. 3:24-cv-05124, MDLC ID 1864 (Question 30.a)
115. WHB 931, No. 3:24-cv-05130, MDLC ID 1865 (Question 30.a)
116. WHB 427, No. 3:24-cv-05132, MDLC ID 1866 (Question 30.a)
117. WHB 1275, No. 3:24-cv-05136, MDLC ID 1867 (Question 30.a)
118. WHB 1425, No. 3:24-cv-05129, MDLC ID 1868 (Question 30.a)
119. WHB 701, No. 3:24-cv-05138, MDLC ID 1869 (Question 30.a)
120. WHB 1610, No. 3:24-cv-05118, MDLC ID 1875 (Question 30.a)
121. WHB 1469, No. 3:24-cv-05123, MDLC ID 1876 (Question 30.a)
122. WHB 1617, No. 3:24-cv-05125, MDLC ID 1877 (Question 30.a)
123. WHB 1386, No. 3:24-cv-05128, MDLC ID 1878 (Question 30.a)
124. WHB 510, No. 3:24-cv-05278, MDLC ID 1879 (Question 30.a)
125. WHB 491, No. 3:24-cv-05268, MDLC ID 1882 (Question 30.a)
126. WHB 605, No. 3:24-cv-05222, MDLC ID 1884 (Question 30.a)
127. WHB 1549, No. 3:24-cv-05275, MDLC ID 1885 (Question 30.a)
128. WHB 1474, No. 3:24-cv-05241, MDLC ID 1888 (Question 30.a)
129. WHB 1535, No. 3:24-cv-05294, MDLC ID 1891 (Question 30.a)
130. WHB 326, No. 3:24-cv-05297, MDLC ID 1892 (Question 30.a)
131. WHB 1832, No. 3:24-cv-05305, MDLC ID 1893 (Question 30.a)
132. WHB 680, No. 3:24-cv-05308, MDLC ID 1894 (Question 30.a)
133. WHB 1006, No. 3:24-cv-05310, MDLC ID 1895 (Question 30.a)
134. WHB 1876, No. 3:24-cv-05230, MDLC ID 1896 (Questions 23.a and 30.a)
135. WHB 1680, No. 3:24-cv-05283, MDLC ID 1901 (Question 30.a)
136. WHB 1655, No. 3:24-cv-05223, MDLC ID 1903 (Question 30.a)
137. WHB 1397, No. 3:24-cv-05269, MDLC ID 1907 (Question 30.a)
138. WHB 623, No. 3:24-cv-05274, MDLC ID 1908 (Question 30.a)
139. WHB 373, No. 3:24-cv-05224, MDLC ID 1910 (Questions 23.a, 26.c and 30.a)
140. WHB 1962, No. 3:24-cv-05240, MDLC ID 1918 (Question 30.a)
141. WHB 1555, No. 3:24-cv-05254, MDLC ID 1919 (Question 30.a)
142. WHB 703, No. 3:24-cv-05361, MDLC ID 1925 (Question 30.a)
143. WHB 645, No. 3:24-cv-05356, MDLC ID 1928 (Question 30.a)
144. WHB 383, No. 3:24-cv-05358, MDLC ID 1929 (Question 30.a)
145. WHB 1855, No. 3:24-cv-05364, MDLC ID 1932 (Questions 23.a and 30.a)
146. WHB 858, No. 3:24-cv-05368, MDLC ID 1935 (Question 30.a)
147. WHB 994, No. 3:24-cv-05452, MDLC ID 1937 (Question 30.a)
148. WHB 662, No. 3:24-cv-05355, MDLC ID 1940 (Questions 26.c and 30.a)
149. WHB 1888, No. 3:24-cv-05457, MDLC ID 1941 (Question 30.a)
150. WHB 335, No. 3:24-cv-05460, MDLC ID 1942 (Question 30.a)
151. WHB 1048, No. 3:24-cv-05462, MDLC ID 1943 (Question 30.a)
152. WHB 1021, No. 3:24-cv-05466, MDLC ID 1947 (Question 30.a)
153. WHB 492, No. 3:24-cv-05470, MDLC ID 1949 (Question 30.a)

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154. WHB 1443, No. 3:24-cv-05472, MDLC ID 1950 (Question 30.a)
155. WHB 952, No. 3:24-cv-05474, MDLC ID 1951 (Question 30.a)
156. WHB 187, No. 3:24-cv-05476, MDLC ID 1952 (Question 30.a)
157. WHB 58, No. 3:24-cv-05477, MDLC ID 1953 (Question 30.a)
158. WHB 1895, No. 3:24-cv-05437, MDLC ID 1955 (Question 30.a)
159. WHB 1879, No. 3:24-cv-05456, MDLC ID 1961 (Question 30.a)
160. WHB 1673, No. 3:24-cv-05552, MDLC ID 1962 (Question 30.a)
161. WHB 1930, No. 3:24-cv-05555, MDLC ID 1963 (Question 30.a)
162. WHB 1618, No. 3:24-cv-05572, MDLC ID 1964 (Question 30.a)
163. WHB 1856, No. 3:24-cv-05461, MDLC ID 1965 (Question 30.a)
164. WHB 1499, No. 3:24-cv-05467, MDLC ID 1966 (Question 30.a)
165. WHB 1596, No. 3:24-cv-05473, MDLC ID 1969 (Question 30.a)
166. WHB 1593, No. 3:24-cv-05504, MDLC ID 1973 (Question 30.a)
167. WHB 1338, No. 3:24-cv-05434, MDLC ID 1974 (Question 30.a)
168. WHB 704, No. 3:24-cv-05436, MDLC ID 1975 (Questions 23.a and 30.a)
169. WHB 1454, No. 3:24-cv-05438, MDLC ID 1976 (Question 30.a)
170. WHB 1476, No. 3:24-cv-05450, MDLC ID 1978 (Questions 23.a and 30.a)
171. WHB 1538, No. 3:24-cv-05465, MDLC ID 1981 (Question 30.a)
172. WHB 1934, No. 3:24-cv-05469, MDLC ID 1983 (Question 30.a)
173. WHB 1969, No. 3:24-cv-05483, MDLC ID 1984 (Question 30.a)
174. WHB 406, No. 3:24-cv-05560, MDLC ID 1985 (Question 30.a)
175. WHB 1414, No. 3:24-cv-05495, MDLC ID 1988 (Question 30.a)
176. WHB 1468, No. 3:24-cv-05500, MDLC ID 1989 (Question 30.a)
177. WHB 1044, No. 3:24-cv-05553, MDLC ID 2054 (Question 30.a)
178. WHB 1840, No. 3:24-cv-05554, MDLC ID 2056 (Question 30.a)
179. WHB 1020, No. 3:24-cv-05558, MDLC ID 2059 (Question 30.a)
180. WHB 1304, No. 3:24-cv-05566, MDLC ID 2060 (Question 30.a)
181. WHB 1860, No. 3:24-cv-05568, MDLC ID 2061 (Question 30.a)
182. WHB 1402, No. 3:24-cv-05570, MDLC ID 2063 (Question 30.a)
183. WHB 342, No. 3:24-cv-05784 MDLC ID 2069 (Question 30.a)
184. WHB 345, No. 3:24-cv-05766, MDLC ID 2071 (Question 30.a)
185. WHB 498, No. 3:24-cv-05769, MDLC ID 2074 (Question 30.a)
186. WHB 706, No. 3:24-cv-05771, MDLC ID 2075 (Question 30.a)
187. WHB 678, No. 3:24-cv-05961, MDLC ID 2078 (Questions 26.c and 30.a)
188. DMA 1, No. 3:24-cv-05968, MDLC ID 2130 (Questions 23.a and 30.a)
189. WHB 517, No. 3:24-cv-05608, MDLC ID 2135 (Question 30.a)
190. WHB 1943, No. 3:24-cv-05598, MDLC ID 2136 (Question 30.a)
191. WHB 1880, No. 3:24-cv-05602, MDLC ID 2139 (Question 30.a)
192. WHB 339, No. 3:24-cv-05614, MDLC ID 2141 (Question 30.a)
193. WHB 1544, No. 3:24-cv-05622, MDLC ID 2146 (Question 30.a)
194. WHB 438, No. 3:24-cv-05631, MDLC ID 2148 (Question 30.a)
195. WHB 393, No. 3:24-cv-05633, MDLC ID 2150 (Question 30.a)
196. WHB 338, No. 3:24-cv-05635, MDLC ID 2151 (Question 30.a)
197. WHB 349, No. 3:24-cv-05636, MDLC ID 2152 (Question 30.a)
198. WHB 359, No. 3:24-cv-05610, MDLC ID 2153 (Question 30.a)
199. WHB 1053, No. 3:24-cv-05612, MDLC ID 2154 (Question 30.a)

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200. WHB 1552, No. 3:24-cv-05599, MDLC ID 2158 (Question 30.a)
201. WHB 1660, No. 3:24-cv-05607, MDLC ID 2159 (Question 30.a)
202. WHB 1449, No. 3:24-cv-05587, MDLC ID 2160 (Questions 26.c and 30.a)
203. WHB 1334, No. 3:24-cv-05624, MDLC ID 2165 (Question 30.a)
204. WHB 1003, No. 3:24-cv-05616, MDLC ID 2173 (Question 30.a)
205. WHB 1348, No. 3:24-cv-05669, MDLC ID 2174 (Question 30.a)
206. WHB 1332, No. 3:24-cv-05670, MDLC ID 2175 (Question 30.a)
207. WHB 1611, No. 3:24-cv-05665, MDLC ID 2176 (Question 30.a)
208. WHB 1416, No. 3:24-cv-05667, MDLC ID 2177 (Question 30.a)
209. WHB 1844, No. 3:24-cv-05697, MDLC ID 2181 (Question 30.a)
210. WHB 946, No. 3:24-cv-05698, MDLC ID 2184 (Question 30.a)
211. WHB 1961, No. 3:24-cv-05711, MDLC ID 2185 (Question 30.a)
212. WHB 505, No. 3:24-cv-05709, MDLC ID 2186 (Question 30.a)
213. WHB 1295, No. 3:24-cv-05713, MDLC ID 2188 (Question 30.a)
214. WHB 647, No. 3:24-cv-05703, MDLC ID 2191 (Questions 26.c and 30.a)
215. WHB 503, No. 3:24-cv-05774, MDLC ID 2197 (Question 30.a)
216. WHB 1481, No. 3:24-cv-05794, MDLC ID 2201 (Questions 23.a and 30.a)
217. WHB 1927, No. 3:24-cv-05802, MDLC ID 2203 (Question 30.a)
218. WHB 520, No. 3:24-cv-05954, MDLC ID 2205 (Question 30.a)
219. WHB 991, No. 3:24-cv-05959, MDLC ID 2206 (Question 30.a)
220. WHB 884, No. 3:24-cv-05948, MDLC ID 2207 (Question 30.a)
221. WHB 513, No. 3:24-cv-05951, MDLC ID 2208 (Question 30.a)
222. WHB 1671, No. 3:24-cv-05953, MDLC ID 2209 (Question 30.a)
223. WHB 2000, No. 3:24-cv-07183, MDLC ID 2630 (Question 30.a)
224. WHB 1031, No. 3:24-cv-07757, MDLC ID 2655 (Question 30.a)

The following Plaintiffs represented by your firm have purported to answer a question in the PFS with “will supplement” or words to that effect:

1. WHB 1966, No. 3:24-cv-04546, MDLC ID 1479 (Question 7)
2. WHB 1027, No. 3:24-cv-04820, MDLC ID 1533 (Question 7)
3. WHB 928, No. 3:24-cv-04825, MDLC ID 1535 (Question 7)
4. WHB 188, No. 3:24-cv-04834, MDLC ID 1539 (Question 40.a)
5. WHB 397, No. 3:24-cv-04838, MDLC ID 1541 (Question 7)
6. WHB 860, No. 3:24-cv-04845, MDLC ID 1549 (Questions 7 and 8)
7. WHB 601, No. 3:24-cv-04882, MDLC ID 1562 (Question 40.a)
8. WHB 1017, No. 3:24-cv-04806, MDLC ID 1583 (Question 30.a)
9. WHB 1399, No. 3:24-cv-04811, MDLC ID 1585 (Questions 10.b and 10.c)
10. WHB 1835, No. 3:24-cv-04824, MDLC ID 1590 (Question 40.a)
11. WHB 600, No. 3:24-cv-04941, MDLC ID 1594 (Questions 7 and 40.a)
12. WHB 1658, No. 3:24-cv-04907, MDLC ID 1597 (Questions 7, 29.a and 30.a)
13. WHB 56, No. 3:24-cv-04908, MDLC ID 1598 (Questions 7, 29.a and 30.a)
14. WHB 317, No. 3:24-cv-04853, MDLC ID 1604 (Question 7)
15. WHB 526, No. 3:24-cv-04901, MDLC ID 1614 (Question 7)
16. WHB 1002, No. 3:24-cv-04885, MDLC ID 1627 (Question 40.a)
17. WHB 203, No. 3:24-cv-04912, MDLC ID 1630 (Questions 7 and 40.a)
18. WHB 1387, No. 3:24-cv-04958, MDLC ID 1635 (Questions 7 and 29.a)

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19. WHB 1422, No. 3:24-cv-04925, MDLC ID 1648 (Question 7)
20. WHB 1123, No. 3:24-cv-04850, MDLC ID 1659 (Question 7)
21. WHB 950, No. 3:24-cv-04931, MDLC ID 1681 (Question 40.a)
22. WHB 1667, No. 3:24-cv-04957, MDLC ID 1688 (Question 7)
23. WHB 1546, No. 3:24-cv-04969, MDLC ID 1689 (Question 40.a)
24. WHB 1619, No. 3:24-cv-04961, MDLC ID 1690 (Questions 7 and 40.a)
25. WHB 1847, No. 3:24-cv-04945, MDLC ID 1693 (Question 23.a)
26. WHB 696, No. 3:24-cv-04979, MDLC ID 1695 (Questions 7, 30.a, 36.a, and 40.a)
27. WHB 1834, No. 3:24-cv-04980, MDLC ID 1696 (Question 30.a)
28. WHB 628, No. 3:24-cv-05006, MDLC ID 1705 (Question 7)
29. WHB 530, No. 3:24-cv-05091, MDLC ID 1711 (Question 7)
30. WHB 1489, No. 3:24-cv-05093, MDLC ID 1715 (Questions 7 and 30.a)
31. WHB 862, No. 3:24-cv-05097, MDLC ID 1717 (Question 30.a)
32. WHB 1269, No. 3:24-cv-05025, MDLC ID 1732 (Questions 5, 7 and 8)
33. WHB 1941, No. 3:24-cv-05032, MDLC ID 1739 (Questions 7, 10.b, 10.c, 26.a, 29.a, and 40.a)
34. WHB 1606, No. 3:24-cv-05066, MDLC ID 1757 (Question 30.a)
35. WHB 1431, No. 3:24-cv-05057, MDLC ID 1759 (Questions 5, 7, 30.a, and 40.a)
36. WHB 599, No. 3:24-cv-05062, MDLC ID 1764 (Questions 7 and 30.a)
37. WHB 1953, No. 3:24-cv-05085, MDLC ID 1765 (Question 30.a)
38. WHB 979, No. 3:24-cv-05082, MDLC ID 1770 (Question 7)
39. WHB 931, No. 3:24-cv-05130, MDLC ID 1865 (Questions 7 and 30.a)
40. WHB 427, No. 3:24-cv-05132, MDLC ID 1866 (Questions 7, 30.a, and 40.a)
41. WHB 1425, No. 3:24-cv-05129, MDLC ID 1868 (Questions 7 and 30.a)
42. WHB 701, No. 3:24-cv-05138, MDLC ID 1869 (Question 40.a)
43. WHB 638, No. 3:24-cv-05116, MDLC ID 1874 (Questions 7, 8, 12.a, 26.a, 29.a, 30.a, and 40.a)
44. WHB 1617, No. 3:24-cv-05125, MDLC ID 1877 (Question 7)
45. WHB 1386, No. 3:24-cv-05128, MDLC ID 1878 (Question 7)
46. WHB 510, No. 3:24-cv-05278, MDLC ID 1879 (Question 30.a)
47. WHB 644, No. 3:24-cv-05272, MDLC ID 1883 (Question 10.b)
48. WHB 176, No. 3:24-cv-05286, MDLC ID 1886 (Question 30.a)
49. WHB 451, No. 3:24-cv-05256, MDLC ID 1897 (Question 10.a)
50. WHB 1949, No. 3:24-cv-05259, MDLC ID 1898 (Question 7)
51. WHB 428, No. 3:24-cv-05236, MDLC ID 1917 (Questions 7, 8, 26.a, 26.b, and 30.a)
52. WHB 1962, No. 3:24-cv-05240, MDLC ID 1918 (Questions 10.a and 29.a)
53. WHB 1272, No. 3:24-cv-05366, MDLC ID 1926 (Questions 7, 8, 10.a, 10.b, and 10.c)
54. WHB 873, No. 3:24-cv-05351, MDLC ID 1931 (Question 40.a)
55. WHB 335, No. 3:24-cv-05460, MDLC ID 1942 (Question 7)
56. WHB 1048, No. 3:24-cv-05462, MDLC ID 1943 (Questions 7 and 30.a)
57. WHB 1596, No. 3:24-cv-05473, MDLC ID 1969 (Question 40.a)
58. WHB 1338, No. 3:24-cv-05434, MDLC ID 1974 (Questions 5, 7, 8, 26.a, 26.b, and 30.a)
59. WHB 704, No. 3:24-cv-05436, MDLC ID 1975 (Question 40.a)
60. WHB 1454, No. 3:24-cv-05438, MDLC ID 1976 (Question 40.a)
61. WHB 473, No. 3:24-cv-05459, MDLC ID 1980 (Question 7)

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62. WHB 1414, No. 3:24-cv-05495, MDLC ID 1988 (Question 40.a)
63. WHB 1044, No. 3:24-cv-05553, MDLC ID 2054 (Questions 10.a and 40.a)
64. WHB 1860, No. 3:24-cv-05568, MDLC ID 2061 (Question 7)
65. WHB 1010, No. 3:24-cv-05773, MDLC ID 2064 (Question 7)
66. WHB 375, No. 3:24-cv-05781, MDLC ID 2067 (Question 7)
67. WHB 498, No. 3:24-cv-05769, MDLC ID 2074 (Question 7)
68. WHB 678, No. 3:24-cv-05961, MDLC ID 2078 (Question 40.a)
69. WHB 1381, No. 3:24-cv-05603, MDLC ID 2133 (Questions 7, 8, 11, 12.a, 13.a, 13.c, 14.a, 14.c, 17, 20, 23.a, 26.a, 26.b, 26.c, 30.a, 36.a, and 40.a)
70. WHB 632, No. 3:24-cv-05604, MDLC ID 2134 (Questions 7, 8, 30.a, and 40.a)
71. WHB 339, No. 3:24-cv-05614, MDLC ID 2141 (Question 7)
72. WHB 1544, No. 3:24-cv-05622, MDLC ID 2146 (Question 7)
73. WHB 438, No. 3:24-cv-05631, MDLC ID 2148 (Questions 7 and 30.a)
74. WHB 393, No. 3:24-cv-05633, MDLC ID 2150 (Questions 7, 10.b, 10.c, and 30.a)
75. WHB 338, No. 3:24-cv-05635, MDLC ID 2151 (Question 30.a)
76. WHB 349, No. 3:24-cv-05636, MDLC ID 2152 (Questions 7 and 30.a)
77. WHB 1552, No. 3:24-cv-05599, MDLC ID 2158 (Questions 7, 30.a, and 40.a)
78. WHB 1003, No. 3:24-cv-05616, MDLC ID 2173 (Question 40.a)
79. WHB 1348, No. 3:24-cv-05669, MDLC ID 2174 (Question 7)
80. WHB 1611, No. 3:24-cv-05665, MDLC ID 2176 (Questions 2, 3, 5, 7, 8, 10.a, 11, 13.a, 13.c, 14.a, 14.c, 16, 17, 36.a, and 40.a)
81. WHB 891, No. 3:24-cv-05666, MDLC ID 2178 (Questions 5, 7, 8, 26.a, 26.b, 30.a, and 40.a)
82. WHB 1556, No. 3:24-cv-05986, MDLC ID 2180 (Questions 7, 29.a, 30.a, and 40.a)
83. WHB 946, No. 3:24-cv-05698, MDLC ID 2184 (Questions 7, 26.a, 26.b, and 26.c)
84. WHB 505, No. 3:24-cv-05709, MDLC ID 2186 (Questions 7 and 30.a)
85. WHB 1142, No. 3:24-cv-05712, MDLC ID 2187 (Questions 7, 26.a and 26.b)
86. WHB 1057, No. 3:24-cv-05715, MDLC ID 2189 (Question 7)
87. WHB 1470, No. 3:24-cv-05716, MDLC ID 2190 (Questions 7 and 8)
88. WHB 871, No. 3:24-cv-05770, MDLC ID 2196 (Questions 7, 8, 26.a, 26.b, and 30.a)
89. WHB 413, No. 3:24-cv-05782, MDLC ID 2198 (Questions 2, 8, and 30.a)
90. WHB 1317, No. 3:24-cv-05791, MDLC ID 2199 (Questions 2, 7, 8, 16, and 30.a)
91. WHB 991, No. 3:24-cv-05959, MDLC ID 2206 (Questions 7 and 8)
92. WHB 884, No. 3:24-cv-05948, MDLC ID 2207 (Question 7)
93. WHB 513, No. 3:24-cv-05951, MDLC ID 2208 (Questions 7 and 8)
94. WHB 1999, No. 3:24-cv-07048, MDLC ID 2629 (Questions 7 and 29.a)
95. WHB 2000, No. 3:24-cv-07183, MDLC ID 2630 (Questions 3, 7, and 29.a)

Per the Court's November 18 order, each Plaintiff identified above must serve a verified fact sheet with responses to all questions by no later than Wednesday, December 18, 2024.

Uber reserves all rights with respect to all deficiencies in your client's PFS, including the right to move for dismissal with prejudice as to any Plaintiff who does not promptly provide sufficient disclosures in compliance with the Court's November 18 order and PTO 10.

(Continued on following page)

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Williams Hart & Boundas LLP

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Sincerely,

**PAUL, WEISS, RIFKIND, WHARTON
& GARRISON LLP**

By: /s/ Kyle Smith

Kyle Smith
2001 K Street, NW
Washington, DC 20006-1047
(202) 223-7407
ksmith@paulweiss.com

EXHIBIT B

From: [Murray, Louis](#)
To: [Walt Cubberly](#); [Margret Lecocke](#); [Brian Abramson](#); [John Eddie Williams Jr.](#); [Batami Baskin](#); [Myles Shaw](#); [Lynn Lagarde](#); [Reina Dimanche](#)
Cc: [Atkins, Robert A](#); [Rubin, Jacqueline P](#); [Smith, Kyle](#); [Luskey, Randy](#); [Phillips, Jessica E](#); [Grusauskas, Caitlin E](#); [Wolf, Marc Price](#); [Tipton, Alex](#); [Doolan, Devin J](#); [Wollmuth, Jack](#); [Cunningham, Ridan](#)
Subject: RE: MDL 3084 - Letter re Compliance with PTO 10 and the Court's November 18, 2024 Order
Date: Tuesday, December 24, 2024 8:37:35 PM
Attachments: [2024.12.24 - List of WHB Plaintiffs Who Have Not Complied with 11.18 Order.docx](#)

Counsel,

Uber requests a meet and confer to discuss the Plaintiffs listed in the attached Word document. These 141 individuals have not conformed their PFS submissions with the Court's November 18, 2024 Order.

Are you available at 1:00 PM CT on Thursday, December 26? If not, please propose other times when you would be available to meet and confer between Thursday, December 26 and Tuesday, December 31. As a reminder, per Pretrial Order No. 8, unless "both parties otherwise agree, the meet and confer process shall begin within three business days of a party making a request for the meet and confer conference."

Best,
Louis

Louis A. Murray | Associate
Paul, Weiss, Rifkind, Wharton & Garrison LLP
1285 Avenue of the Americas | New York, NY 10019-6064
+1 212 373 2749 (Direct Phone)
lmurray@paulweiss.com | www.paulweiss.com

From: Cunningham, Ridan <rcunningham@paulweiss.com>
Sent: Monday, December 9, 2024 1:45 PM
To: Walt Cubberly <wcubberly@whlaw.com>; Margret Lecocke <mlecocke@whlaw.com>; Brian Abramson <babramson@whlaw.com>; John Eddie Williams Jr. <jjwilliams@whlaw.com>; Batami Baskin <bbaskin@whlaw.com>; Myles Shaw <mshaw@whlaw.com>; Lynn Lagarde <llagarde@whlaw.com>; Reina Dimanche <rdimanche@whlaw.com>
Cc: Atkins, Robert A <ratkins@paulweiss.com>; Rubin, Jacqueline P <jrubin@paulweiss.com>; Smith, Kyle <ksmith@paulweiss.com>; Luskey, Randy <rluskey@paulweiss.com>; Phillips, Jessica E <jphillips@paulweiss.com>; Grusauskas, Caitlin E <cgrusauskas@paulweiss.com>; Wolf, Marc Price <mpricewolf@paulweiss.com>; Murray, Louis <lmurray@paulweiss.com>
Subject: MDL 3084 - Letter re Compliance with PTO 10 and the Court's November 18, 2024 Order

Counsel,

Please see the attached correspondence.

Best,

Ridan

Ridan Cunningham | Associate

Paul, Weiss, Rifkind, Wharton & Garrison LLP

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Pronouns: He/Him

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EXHIBIT B-1

Plaintiff	Date Complaint Was Filed	Non-Compliance with November 18, 2024 Order
Jane Doe F-2, No. 3:23-cv-03949, MDLC ID 1044	8/7/2023	Required to Provide Third-Party Contact Information in Response to Question 30.a
WHB 1966, No. 3:24-cv-04546, MDLC ID 1479	7/27/2024	Required to Provide Third-Party Contact Information in Response to Question 30.a
WHB 1841, No. 3:24-cv-04799, MDLC ID 1521	8/7/2024	Required to Provide Third-Party Contact Information in Response to Question 30.a
WHB 1882, No. 3:24-cv-04813, MDLC ID 1531	8/7/2024	Unverified Amended PFS
WHB 1027, No. 3:24-cv-04820, MDLC ID 1533	8/7/2024	Unverified Second Amended PFS
WHB 928, No. 3:24-cv-04825, MDLC ID 1535	8/7/2024	Unverified Second Amended PFS
WHB 188, No. 3:24-cv-04834, MDLC ID 1539	8/7/2024	Required to Supplement Answer to Question 40.a
WHB 1682, No. 3:24-cv-04835, MDLC ID 1540	8/7/2024	Unverified Amended PFS
WHB 531, No. 3:24-cv-04846, MDLC ID 1543	8/7/2024	Unverified Amended PFS

WHB 1341, No. 3:24-cv-04839, MDLC ID 1547	8/7/2024	Unverified Second Amended PFS
WHB 860, No. 3:24-cv-04845, MDLC ID 1549	8/7/2024	Unverified Original PFS; Required to Supplement Answers to Questions 7 and 8.
WHB 511, No. 3:24-cv-04842, MDLC ID 1551	8/7/2024	Unverified Second Amended PFS
WHB 601, No. 3:24-cv-04882, MDLC ID 1562	8/8/2024	Unverified Second Amended PFS; Required to Supplement Answer to Question 40.a
WHB 1023, No. 3:24-cv-04877, MDLC ID 1563	8/8/2024	Unverified Amended PFS
WHB 196, No. 3:24-cv-04886, MDLC ID 1573	8/8/2024	Required to Provide Third-Party Contact Information in Response to Question 30.a
WHB 1017, No. 3:24-cv-04806, MDLC ID 1583	8/7/2024	Unverified Amended PFS
WHB 1399, No. 3:24-cv-04811, MDLC ID 1585	8/7/2024	Required to Supplement Answers to Questions 10.b and 10.c
WHB 1835, No. 3:24-cv-04824, MDLC ID 1590	8/7/2024	Required to Provide Third-Party Contact Information in Response to Question 26.c

WHB 1293, No. 3:24-cv-04817, MDLC ID 1593	8/7/2024	Unverified Amended PFS
WHB 333, No. 3:24-cv-04905, MDLC ID 1595	8/8/2024	Unverified Amended PFS
WHB 1658, No. 3:24-cv-04907, MDLC ID 1597	8/8/2024	Unverified Amended PFS
WHB 56, No. 3:24-cv-04908, MDLC ID 1598	8/8/2024	Unverified Amended PFS
WHB 317, No. 3:24-cv-04853, MDLC ID 1604	8/8/2024	Unverified Second Amended PFS
WHB 1951, No. 3:24-cv-04895, MDLC ID 1609	8/8/2024	Required to Provide Third-Party Contact Information in Response to Questions 23.a and 30.a
WHB 700, No. 3:24-cv-04899, MDLC ID 1612	8/8/2024	Unverified Amended PFS
WHB 526, No. 3:24-cv-04901, MDLC ID 1614	8/8/2024	Unverified Amended PFS
WHB 310, No. 3:24-cv-04903, MDLC ID 1616	8/8/2024	Unverified Amended PFS

WHB 1002, No. 3:24-cv-04885, MDLC ID 1627	8/8/2024	Unverified Amended PFS
WHB 203, No. 3:24-cv-04912, MDLC ID 1630	8/8/2024	Unverified Original PFS; Required to Provide Third-Party Contact Information in Response to Question 30.a; Required to Supplement Answers to Questions 7 and 40.a
WHB 689, No. 3:24-cv-04965, MDLC ID 1631	8/9/2024	Unverified Amended PFS
WHB 1497, No. 3:24-cv-04891, MDLC ID 1632	8/8/2024	Unverified Amended PFS
WHB 603, No. 3:24-cv-04971, MDLC ID 1633	8/9/2024	Unverified Amended PFS
WHB 1387, No. 3:24-cv-04958, MDLC ID 1635	8/9/2024	Unverified Amended PFS
WHB 1896, No. 3:24-cv-04975, MDLC ID 1638	8/9/2024	Unverified Amended PFS
WHB 1123, No. 3:24-cv-04850, MDLC ID 1659	8/8/2024	Unverified Amended PFS
WHB 950, No. 3:24-cv-04931, MDLC ID 1681	8/9/2024	Required to Supplement Answer to Question 40.a

WHB 1873, No. 3:24-cv-04933, MDLC ID 1682	8/9/2024	Unverified Amended PFS
WHB1619, No. 3:24-cv-04961, MDLC ID 1690	8/9/2024	Unverified Amended PFS
WHB 1847, No. 3:24-cv-04945, MDLC ID 1693	8/9/2024	Required to Supplement Answer to Question 23.a
WHB 696, No. 3:24-cv-04979, MDLC ID 1695	8/9/2024	Unverified Amended PFS
WHB175, No. 3:24-cv-04982, MDLC ID 1697	8/9/2024	Unverified Amended PFS; Required to Provide Third-Party Contact Information in Response to Questions 23.a and 30.a
WHB 1908, No. 3:24-cv-05050, MDLC ID 1708	8/12/2024	Required to Provide Third-Party Contact Information in Response to Question 30.a
WHB 530, No. 3:24-cv-05091, MDLC ID 1711	8/13/2024	Unverified Amended PFS
WHB 649, No. 3:24-cv-05095, MDLC ID 1712	8/13/2024	Unverified Amended PFS
WHB 1489, No. 3:24-cv-05093, MDLC ID 1715	8/13/2024	Required to Provide Third-Party Contact Information in Response to Question 30.a

WHB 862, No. 3:24-cv-05097, MDLC ID 1717	8/13/2024	Required to Provide Third-Party Contact Information in Response to Question 30.a; Required to Supplement Answer to Question 30.a
WHB 1845, No. 3:24-cv-05015, MDLC ID 1725	8/10/2024	Unverified Amended PFS
WHB 1900, No. 3:24-cv-05031, MDLC ID 1726	8/12/2024	Unverified Amended PFS
WHB 1007, No. 3:24-cv-05023, MDLC ID 1731	8/12/2024	Unverified Amended PFS
WHB 1269, No. 3:24-cv-05025, MDLC ID 1732	8/12/2024	Unverified Amended PFS
WHB 676, No. 3:24-cv-05024, MDLC ID 1734	8/12/2024	Unverified Amended PFS
WHB 1941, No. 3:24-cv-05032, MDLC ID 1739	8/12/2024	Unverified Amended PFS
WHB 999, No. 3:24-cv-05036, MDLC ID 1748	8/12/2024	Unverified Amended PFS
WHB 1431, No. 3:24-cv-05057, MDLC ID 1759	8/12/2024	Unverified Amended PFS

WHB 12, No. 3:24-cv-05058, MDLC ID 1760	8/12/2024	Unverified Amended PFS; Required to Provide Third-Party Contact Information in Response to Question 30.a
WHB 1919, No. 3:24-cv-05059, MDLC ID 1761	8/12/2024	Unverified Amended PFS
WHB 1953, No. 3:24-cv-05085, MDLC ID 1765	8/13/2024	Required to Provide Third-Party Contact Information in Response to Question 30.a; Required to Supplement Answer to Question 30.a
WHB 979, No. 3:24-cv-05082, MDLC ID 1770	8/13/2024	Unverified Amended PFS; Required to Supplement Answer to Question 7
WHB 666, No. 3:24-cv-05127, MDLC ID 1788	8/14/2024	Unverified Amended PFS
WHB 504, No. 3:24-cv-05243, MDLC ID 1838	8/16/2024	Unverified Amended PFS
WHB 823, No. 3:24-cv-05041, MDLC ID 1845	8/12/2024	Unverified Amended PFS
WHB 701, No. 3:24-cv-05138, MDLC ID 1869	8/14/2024	Required to Provide Third-Party Contact Information in Response to Question 30.a; Required to Supplement Answer to Question 40.a
WHB 1617, No. 3:24-cv-05125, MDLC ID 1877	8/14/2024	Required to Provide Third-Party Contact Information in Response to

		Question 30.a; Required to Supplement Answer to Question 7
WHB 644, No. 3:24-cv-05272, MDLC ID 1883	8/16/2024	Required to Supplement Answer to Question 10.b
WHB 1832, No. 3:24-cv-05305, MDLC ID 1893	8/16/2024	Unverified Original PFS
WHB 451, No. 3:24-cv-05256, MDLC ID 1897	8/16/2024	Unverified Original PFS; Required to Supplement Answer to Question 10.a
WHB 1949, No. 3:24-cv-05259, MDLC ID 1898	8/16/2024	Required to Supplement Answer to Question 7
WHB 1655, No. 3:24-cv-05223, MDLC ID 1903	8/16/2024	Unverified Amended PFS.
WHB 373, No. 3:24-cv-05224, MDLC ID 1910	8/16/2024	Unverified Amended PFS
WHB 428, No. 3:24-cv-05236, MDLC ID 1917	8/16/2024	Unverified Amended PFS
WHB 703, No. 3:24-cv-05361, MDLC ID 1925	8/19/2024	Unverified Amended PFS
WHB 1272, No. 3:24-cv-05366, MDLC ID 1926	8/19/2024	Unverified Amended PFS; Required to Supplement Answer to Question 7

WHB 873, No. 3:24-cv-05351, MDLC ID 1931	8/19/2024	Unverified Amended PFS
WHB 994, No. 3:24-cv-05452, MDLC ID 1937	8/20/2024	Unverified Amended PFS
WHB 662, No. 3:24-cv-05355, MDLC ID 1940	8/19/2024	Unverified Amended PFS
WHB 1888, No. 3:24-cv-05457, MDLC ID 1941	8/20/2024	Unverified Amended PFS
WHB 335, No. 3:24-cv-05460, MDLC ID 1942	8/20/2024	Unverified Amended PFS
WHB 1048, No. 3:24-cv-05462, MDLC ID 1943	8/20/2024	Unverified Amended PFS
WHB 1021, No. 3:24-cv-05466, MDLC ID 1947	8/20/2024	Unverified Second Amended PFS
WHB 1661, No. 3:24-cv-05468, MDLC ID 1948	8/20/2024	Unverified Original PFS
WHB 1443, No. 3:24-cv-05472, MDLC ID 1950	8/20/2024	Unverified Second Amended PFS

WHB 1540, No. 3:24-cv-05449, MDLC ID 1959	8/20/2024	Unverified Amended PFS
WHB 1930, No. 3:24-cv-05555, MDLC ID 1963	8/21/2024	Unverified Amended PFS
WHB 1618, No. 3:24-cv-05572, MDLC ID 1964	8/21/2024	Required to Provide Third-Party Contact Information in Response to Question 30.a
WHB 981, No. 3:24-cv-05573, MDLC ID 1967	8/21/2024	Unverified Original PFS
WHB 1596, No. 3:24-cv-05473, MDLC ID 1969	8/20/2024	Required to Supplement Answer to Question 40.a
WHB 1457, No. 3:24-cv-05576, MDLC ID 1971	8/21/2024	Unverified Amended PFS
WHB 1043, No. 3:24-cv-05501, MDLC ID 1972	8/20/2024	Unverified Second Amended PFS
WHB 1338, No. 3:24-cv-05434, MDLC ID 1974	8/20/2024	Unverified Amended PFS
WHB 473, No. 3:24-cv-05459, MDLC ID 1980	8/20/2024	Unverified Amended PFS

WHB 406, No. 3:24-cv-05560, MDLC ID 1985	8/21/2024	Unverified Amended PFS
WHB 1414, No. 3:24-cv-05495, MDLC ID 1988	8/20/2024	Unverified Original PFS; Required to Provide Third-Party Contact Information in Response to Question 30.a; Required to Supplement Answer to Question 40.a
WHB 1468, No. 3:24-cv-05500, MDLC ID 1989	8/20/2024	Unverified Amended PFS
WHB 1044, No. 3:24-cv-05553, MDLC ID 2054	8/21/2024	Required to Supplement Answers to Questions 10.a and 40.a
WHB 1324, No. 3:24-cv-05561, MDLC ID 2055	8/21/2024	Unverified Amended PFS
WHB 1840, No. 3:24-cv-05554, MDLC ID 2056	8/21/2024	Unverified Amended PFS
WHB 1677, No. 3:24-cv-05556, MDLC ID 2057	8/21/2024	Unverified Amended PFS
WHB 1860, No. 3:24-cv-05568, MDLC ID 2061	8/21/2024	Unverified Amended PFS
WHB 1010, No. 3:24-cv-05773, MDLC ID 2064	8/23/2024	Required to Supplement Answer to Question 7

WHB 935, No. 3:24-cv-05776, MDLC ID 2065	8/23/2024	Unverified Amended PFS
WHB 1484, No. 3:24-cv-05779, MDLC ID 2066	8/23/2024	Unverified Amended PFS
WHB 375, No. 3:24-cv-05781, MDLC ID 2067	8/23/2024	Unverified Original PFS; Required to Supplement Answer to Question 7
WHB 1659, No. 3:24-cv-05565, MDLC ID 2070	8/21/2024	Unverified Amended PFS
WHB 345, No. 3:24-cv-05766, MDLC ID 2071	8/23/2024	Unverified Amended PFS
WHB 706, No. 3:24-cv-05771, MDLC ID 2075	8/23/2024	Unverified Amended PFS
WHB 678, No. 3:24-cv-05961, MDLC ID 2078	8/26/2024	Required to Supplement Answer to Question 40.a
WHB 1381, No. 3:24-cv-05603, MDLC ID 2133	8/21/2024	Unverified Amended PFS
WHB 632, No. 3:24-cv-05604, MDLC ID 2134	8/21/2024	Unverified Second Amended PFS

WHB 517, No. 3:24-cv-05608, MDLC ID 2135	8/21/2024	Unverified Amended PFS
WHB 1880, No. 3:24-cv-05602, MDLC ID 2139	8/21/2024	Unverified Amended PFS
WHB 339, No. 3:24-cv-05614, MDLC ID 2141	8/21/2024	Unverified Amended PFS
WHB 1544, No. 3:24-cv-05622, MDLC ID 2146	8/21/2024	Unverified Original PFS; Required to Provide Third-Party Contact Information in Response to Question 30.a; Required to Supplement Answer to Question 7
WHB 438, No. 3:24-cv-05631, MDLC ID 2148	8/21/2024	Unverified Amended PFS
WHB 393, No. 3:24-cv-05633, MDLC ID 2150	8/21/2024	Unverified Amended PFS; Required to Provide Third-Party Contact Information in Response to Question 30.a; Required to Supplement Answer to Question 7
WHB 349, No. 3:24-cv-05636, MDLC ID 2152	8/21/2024	Unverified Amended PFS
WHB 1053, No. 3:24-cv-05612, MDLC ID 2154	8/21/2024	Unverified Amended PFS.

WHB 1552, No. 3:24-cv-05599, MDLC ID 2158	8/21/2024	Unverified Amended PFS
WHB 465, No. 3:24-cv-05617, MDLC ID 2162	8/21/2024	Unverified Amended PFS
WHB 1334, No. 3:24-cv-05624, MDLC ID 2165	8/21/2024	Unverified Amended PFS
WHB 1348, No. 3:24-cv-05669, MDLC ID 2174	8/22/2024	Unverified Amended PFS
WHB 1611, No. 3:24-cv-05665, MDLC ID 2176	8/22/2024	Unverified Amended PFS
WHB 1416, No. 3:24-cv-05667, MDLC ID 2177	8/22/2024	Required to Provide Third-Party Contact Information in Response to Question 30.a
WHB 435, No. 3:24-cv-05668, MDLC ID 2179	8/22/2024	Unverified Amended PFS
WHB 1556, No. 3:24-cv-05986, MDLC ID 2180	8/26/2024	Unverified Amended PFS
WHB 1947, No. 3:24-cv-05714, MDLC ID 2183	8/22/2024	Unverified Original PFS

WHB 946, No. 3:24-cv-05698, MDLC ID 2184	8/22/2024	Unverified Amended PFS; Required to Provide Third-Party Contact Information in Response to Question 30.a
WHB 505, No. 3:24-cv-05709, MDLC ID 2186	8/22/2024	Unverified Amended PFS
WHB 1142, No. 3:24-cv-05712, MDLC ID 2187	8/22/2024	Unverified Amended PFS
WHB 1057, No. 3:24-cv-05715, MDLC ID 2189	8/22/2024	Unverified Amended PFS
WHB 1470, No. 3:24-cv-05716, MDLC ID 2190	8/22/2024	Unverified Amended PFS
WHB 1843, No. 3:24-cv-05693, MDLC ID 2193	8/22/2024	Unverified Original PFS
WHB 856, No. 3:24-cv-05699, MDLC ID 2194	8/22/2024	Unverified Original PFS
WHB 1398, No. 3:24-cv-05705, MDLC ID 2195	8/22/2024	Unverified Original PFS
WHB 871, No. 3:24-cv-05770, MDLC ID 2196	8/23/2024	Unverified Amended PFS

WHB 1317, No. 3:24-cv-05791, MDLC ID 2199	8/23/2024	Unverified Amended PFS; Required to Supplement Answer to Question 2
WHB 1481, No. 3:24-cv-05794, MDLC ID 2201	8/23/2024	Unverified Amended PFS
WHB 991, No. 3:24-cv-05959, MDLC ID 2206	8/26/2024	Unverified Amended PFS
WHB 884, No. 3:24-cv-05948, MDLC ID 2207	8/26/2024	Unverified Amended PFS
WHB 513, No. 3:24-cv-05951, MDLC ID 2208	8/26/2024	Unverified Original PFS; Required to Provide Third-Party Contact Information in Response to Question 30.a; Required to Supplement Answers to Questions 7 and 8
WHB 1999, No. 3:24-cv-07048, MDLC ID 2629	10/8/2024	Unverified Amended PFS
WHB 2000, No. 3:24-cv-07183, MDLC ID 2630	10/15/2024	Unverified Amended PFS

EXHIBIT C

From: [Murray, Louis](#)
To: [Walt Cubberly](#); [Margret Lecocke](#); [Brian Abramson](#); [John Eddie Williams Jr.](#); [Batami Baskin](#); [Myles Shaw](#); [Lynn Lagarde](#); [Reina Dimanche](#)
Cc: [Atkins, Robert A](#); [Smith, Kyle](#); [Rubin, Jacqueline P](#); [Luskey, Randy](#); [Phillips, Jessica E](#); [Grusauskas, Caitlin E](#); [Wolf, Marc Price](#); [Tipton, Alex](#); [Doolan, Devin J](#); [Wollmuth, Jack](#); [Cunningham, Ridan](#)
Subject: RE: MDL 3084 - Letter re Compliance with PTO 10 and the Court's November 18, 2024 Order
Date: Friday, January 3, 2025 8:26:18 AM
Attachments: [image001.png](#)
[image002.png](#)
[image003.png](#)
[image004.png](#)
[image005.png](#)
[2025.01.03 - List of WHB Plaintiffs Who Have Not Complied with 11.18 Order.docx](#)
[Redline - 2025.01.02 - List of WHB Plaintiffs Who Have Not Complied with 11.18 Order and 2025.01.03 - List of WHB Plaintiffs Who Have Not Complied with 11.18 Or.pdf](#)

Hi Walt,

Thank you for meeting and conferring yesterday. Here is a revised list of Plaintiffs represented by Williams Hart & Boundas who have not conformed their PFS submissions with the Court's November 18, 2024 Order. The list now identifies when each Plaintiff last submitted a signed verification to MDL Centrality.

Our records show that 96 of the 127 Plaintiffs at issue have never submitted a signed verification. 20 of the 31 Plaintiffs who have submitted a signed verification at some point last submitted one before the Court's November 18 Order. As for the remaining 11 Plaintiffs who have submitted a signed verification after the November 18 Order, we are willing to grant those individuals a further extension of the Court's December 18, 2024 deadline—until January 17, 2025—to cure the remaining outstanding deficiencies.

Please let us know if you disagree with the information listed in this spreadsheet for any individual case. Please also send us a full list of Plaintiffs who we should remove from the list because they will not be proceeding in the MDL or because, due to factually specific information regarding that Plaintiff's unique circumstances, you believe an extension is warranted. Finally, please let us know what time you are available to meet and confer further on Wednesday.

Best,
Louis

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From: Murray, Louis
Sent: Thursday, January 2, 2025 10:04 AM
To: Walt Cubberly <wcubberly@whlaw.com>; Margret Lecocke <mlecocke@whlaw.com>; Brian Abramson <babramson@whlaw.com>; John Eddie Williams Jr. <jjwilliams@whlaw.com>; Batami Baskin <bbaskin@whlaw.com>; Myles Shaw <mshaw@whlaw.com>; Lynn Lagarde

<llagarde@whlaw.com>; Reina Dimanche <rdimanche@whlaw.com>

Cc: Atkins, Robert A <ratkins@paulweiss.com>; Rubin, Jacqueline P <jrubin@paulweiss.com>; Luskey, Randy <rluskey@paulweiss.com>; Phillips, Jessica E <jphillips@paulweiss.com>; Grusauskas, Caitlin E <cgrusauskas@paulweiss.com>; Wolf, Marc Price <mpricewolf@paulweiss.com>; Tipton, Alex <atipton@paulweiss.com>; Doolan, Devin J <ddoolan@paulweiss.com>; Wollmuth, Jack <JWollmuth@paulweiss.com>; Cunningham, Ridan <rcunningham@paulweiss.com>; Smith, Kyle <ksmith@paulweiss.com>

Subject: RE: MDL 3084 - Letter re Compliance with PTO 10 and the Court's November 18, 2024 Order

Hi Walt,

I have attached an updated list of Plaintiffs represented by Williams Hart & Boundas who have not conformed their PFS submissions with the Court's November 18, 2024 Order. This list accounts for your firm's recent filings. We look forward to discussing further later today.

Best,
Louis

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From: Murray, Louis

Sent: Friday, December 27, 2024 2:40 PM

To: Walt Cubberly <wcubberly@whlaw.com>; Margret Lecocke <mlecocke@whlaw.com>; Brian Abramson <babramson@whlaw.com>; John Eddie Williams Jr. <jwilliams@whlaw.com>; Batami Baskin <bbaskin@whlaw.com>; Myles Shaw <mshaw@whlaw.com>; Lynn Lagarde <llagarde@whlaw.com>; Reina Dimanche <rdimanche@whlaw.com>

Cc: Atkins, Robert A <ratkins@paulweiss.com>; Rubin, Jacqueline P <jrubin@paulweiss.com>; Luskey, Randy <rluskey@paulweiss.com>; Phillips, Jessica E <jphillips@paulweiss.com>; Grusauskas, Caitlin E <cgrusauskas@paulweiss.com>; Wolf, Marc Price <mpricewolf@paulweiss.com>; Tipton, Alex <atipton@paulweiss.com>; Doolan, Devin J <ddoolan@paulweiss.com>; Wollmuth, Jack <JWollmuth@paulweiss.com>; Cunningham, Ridan <rcunningham@paulweiss.com>; Smith, Kyle <ksmith@paulweiss.com>

Subject: RE: MDL 3084 - Letter re Compliance with PTO 10 and the Court's November 18, 2024 Order

Hi Walt,

We are free at 4:00 PM CT on Thursday. I have circulated an invite.

Best,

Louis

Louis A. Murray | Associate

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From: Smith, Kyle <ksmith@paulweiss.com>

Sent: Friday, December 27, 2024 1:59 PM

To: Walt Cubberly <wcubberly@whlaw.com>; Murray, Louis <lmurray@paulweiss.com>; Margret Lecocke <mlecocke@whlaw.com>; Brian Abramson <babramson@whlaw.com>; John Eddie Williams Jr. <jwilliams@whlaw.com>; Batami Baskin <bbaskin@whlaw.com>; Myles Shaw <mshaw@whlaw.com>; Lynn Lagarde <llagarde@whlaw.com>; Reina Dimanche <rdimanche@whlaw.com>

Cc: Atkins, Robert A <ratkins@paulweiss.com>; Rubin, Jacqueline P <jrubin@paulweiss.com>; Luskey, Randy <rluskey@paulweiss.com>; Phillips, Jessica E <jphillips@paulweiss.com>; Grusauskas, Caitlin E <cgrusauskas@paulweiss.com>; Wolf, Marc Price <mpricewolf@paulweiss.com>; Tipton, Alex <atipton@paulweiss.com>; Doolan, Devin J <ddoolan@paulweiss.com>; Wollmuth, Jack <JWollmuth@paulweiss.com>; Cunningham, Ridan <rcunningham@paulweiss.com>

Subject: RE: MDL 3084 - Letter re Compliance with PTO 10 and the Court's November 18, 2024 Order

Good afternoon Walt — PTO 8 in the MDL requires the meet and confer to take place within 3 business days of the notification. Next Thursday and Friday are after that timeframe.

That being said, assuming you are requesting the professional courtesy of an accommodation based upon the intervening holidays, we are willing to work with you on that and consent to your request, and schedule for next Thursday/Friday. Louis will let you know re: the times you suggested.

Thank you,
Kyle

Kyle Smith | Partner

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Pronouns: He/Him

From: Walt Cubberly <wcubberly@whlaw.com>

Date: Friday, Dec 27, 2024 at 11:54 AM

To: Murray, Louis <lmurray@paulweiss.com>, Margret Lecocke <mlecocke@whlaw.com>, Brian Abramson <babramson@whlaw.com>, John Eddie Williams Jr. <jwilliams@whlaw.com>, Batami Baskin

<bbaskin@whlaw.com>, Myles Shaw <mshaw@whlaw.com>, Lynn Lagarde <llagarde@whlaw.com>, Reina Dimanche <rdimanche@whlaw.com>

Cc: Atkins, Robert A <ratkins@paulweiss.com>, Rubin, Jacqueline P <jrubin@paulweiss.com>, Luskey, Randy <rluskey@paulweiss.com>, Phillips, Jessica E <jphillips@paulweiss.com>, Smith, Kyle <ksmith@paulweiss.com>, Grusauskas, Caitlin E <cgrusauskas@paulweiss.com>, Wolf, Marc Price <mpricewolf@paulweiss.com>, Tipton, Alex <atipton@paulweiss.com>, Doolan, Devin J <ddoolan@paulweiss.com>, Wollmuth, Jack <JWollmuth@paulweiss.com>, Cunningham, Ridan <rcunningham@paulweiss.com>

Subject: RE: MDL 3084 - Letter re Compliance with PTO 10 and the Court's November 18, 2024 Order

Louis, we can be available at 4:00 Central on Thursday or Friday between 10:00 and 11:00 Central. Thanks.

Walt

Walt Cubberly

Attorney

Direct: [713-230-2244](tel:713-230-2244)

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WKHBLLP

From: Murray, Louis <lmurray@paulweiss.com>

Sent: Friday, December 27, 2024 9:14 AM

To: Walt Cubberly <wcubberly@whlaw.com>; Margaret Lecocke <mlecocke@whlaw.com>; Brian Abramson <babramson@whlaw.com>; John Eddie Williams Jr. <jwilliams@whlaw.com>; Batami Baskin <bbaskin@whlaw.com>; Myles Shaw <mshaw@whlaw.com>; Lynn Lagarde <llagarde@whlaw.com>; Reina Dimanche <rdimanche@whlaw.com>

Cc: Atkins, Robert A <ratkins@paulweiss.com>; Rubin, Jacqueline P <jrubin@paulweiss.com>; Luskey, Randy <rluskey@paulweiss.com>; Phillips, Jessica E <jphillips@paulweiss.com>; Smith, Kyle

<ksmith@paulweiss.com>; Grusauskas, Caitlin E <cgrusauskas@paulweiss.com>; Wolf, Marc Price <mpricewolf@paulweiss.com>; Tipton, Alex <atipton@paulweiss.com>; Doolan, Devin J <ddoolan@paulweiss.com>; Wollmuth, Jack <JWollmuth@paulweiss.com>; Cunningham, Ridan <rcunningham@paulweiss.com>

Subject: RE: MDL 3084 - Letter re Compliance with PTO 10 and the Court's November 18, 2024 Order

Hi Walt,

I am following up on this message. Are you or someone else from Williams Hart able to meet and confer at noon CT on Monday? If not, please identify other times next week when you are available.

Best,
Louis

Louis A. Murray | Associate

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From: Smith, Kyle <ksmith@paulweiss.com>

Sent: Tuesday, December 24, 2024 11:14 PM

To: Walt Cubberly <wcubberly@whlaw.com>; Murray, Louis <lmurray@paulweiss.com>; Margret Lecoche <mlecoche@whlaw.com>; Brian Abramson <babramson@whlaw.com>; John Eddie Williams Jr. <jwilliams@whlaw.com>; Batami Baskin <bbaskin@whlaw.com>; Myles Shaw <mshaw@whlaw.com>; Lynn Lagarde <llagarde@whlaw.com>; Reina Dimanche <rdimanche@whlaw.com>

Cc: Atkins, Robert A <ratkins@paulweiss.com>; Rubin, Jacqueline P <jrubin@paulweiss.com>; Luskey, Randy <rluskey@paulweiss.com>; Phillips, Jessica E <jphillips@paulweiss.com>; Grusauskas, Caitlin E <cgrusauskas@paulweiss.com>; Wolf, Marc Price <mpricewolf@paulweiss.com>; Tipton, Alex <atipton@paulweiss.com>; Doolan, Devin J <ddoolan@paulweiss.com>; Wollmuth, Jack <JWollmuth@paulweiss.com>; Cunningham, Ridan <rcunningham@paulweiss.com>

Subject: RE: MDL 3084 - Letter re Compliance with PTO 10 and the Court's November 18, 2024 Order

Counsel:

Your commentary is completely inappropriate and baseless.

We are available to confer at an appropriate and convenient time after the Christmas holiday, as Louis indicated — whether it be later this week or early next week.

Regards,

Kyle

Kyle Smith | Partner

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Pronouns: He/Him

From: Walt Cubberly <wcubberly@whlaw.com>

Date: Tuesday, Dec 24, 2024 at 8:04 PM

To: Murray, Louis <lmurray@paulweiss.com>, Margret Lecocke <mlecocke@whlaw.com>, Brian Abramson <babramson@whlaw.com>, John Eddie Williams Jr. <jwilliams@whlaw.com>, Batami Baskin <bbaskin@whlaw.com>, Myles Shaw <mshaw@whlaw.com>, Lynn Lagarde <llagarde@whlaw.com>, Reina Dimanche <rdimanche@whlaw.com>

Cc: Atkins, Robert A <ratkins@paulweiss.com>, Rubin, Jacqueline P <jrubin@paulweiss.com>, Smith, Kyle <ksmith@paulweiss.com>, Luskey, Randy <rluskey@paulweiss.com>, Phillips, Jessica E <jphillips@paulweiss.com>, Grusauskas, Caitlin E <cgrusauskas@paulweiss.com>, Wolf, Marc Price <mpricewolf@paulweiss.com>, Tipton, Alex <atipton@paulweiss.com>, Doolan, Devin J <ddoolan@paulweiss.com>, Wollmuth, Jack <JWollmuth@paulweiss.com>, Cunningham, Ridan <rcunningham@paulweiss.com>

Subject: Re: MDL 3084 - Letter re Compliance with PTO 10 and the Court's November 18, 2024 Order

Louis,

It is Christmas Eve. And it is really unprofessional for you to do this.

Have a Happy Holidays.

Walt

Get [Outlook for iOS](#)

Walt Cubberly

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WKHBLLP

From: Murray, Louis <lmurray@paulweiss.com>

Sent: Tuesday, December 24, 2024 8:37 PM

To: Walt Cubberly <wcubberly@whlaw.com>; Margret Lecocke <mlecocke@whlaw.com>; Brian Abramson <babramson@whlaw.com>; John Eddie Williams Jr. <jwilliams@whlaw.com>; Batami Baskin <bbaskin@whlaw.com>; Myles Shaw <mshaw@whlaw.com>; Lynn Lagarde <llagarde@whlaw.com>; Reina Dimanche <rdimanche@whlaw.com>

Cc: Atkins, Robert A <ratkins@paulweiss.com>; Rubin, Jacqueline P <jrubin@paulweiss.com>; Smith, Kyle <ksmith@paulweiss.com>; Luskey, Randy <rluskey@paulweiss.com>; Phillips, Jessica E <jphillips@paulweiss.com>; Grusauskas, Caitlin E <cgrusauskas@paulweiss.com>; Wolf, Marc Price <mpricewolf@paulweiss.com>; Tipton, Alex <atipton@paulweiss.com>; Doolan, Devin J <ddoolan@paulweiss.com>; Wollmuth, Jack <JWollmuth@paulweiss.com>; Cunningham, Ridan <rcunningham@paulweiss.com>

Subject: RE: MDL 3084 - Letter re Compliance with PTO 10 and the Court's November 18, 2024 Order

Counsel,

Uber requests a meet and confer to discuss the Plaintiffs listed in the attached Word document. These 141 individuals have not conformed their PFS submissions with the Court's November 18, 2024 Order.

Are you available at 1:00 PM CT on Thursday, December 26? If not, please propose other times when you would be available to meet and confer between Thursday, December 26 and Tuesday, December 31. As a reminder, per Pretrial Order No. 8, unless "both parties otherwise agree, the meet and confer process shall begin within three business days of a party making a request for the meet and confer conference."

Best,
Louis

Louis A. Murray | Associate

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From: Cunningham, Ridan <rcunningham@paulweiss.com>

Sent: Monday, December 9, 2024 1:45 PM

To: Walt Cubberly <wcubberly@whlaw.com>; Margret Lecoche <mlecoche@whlaw.com>; Brian Abramson <babramson@whlaw.com>; John Eddie Williams Jr. <jwilliams@whlaw.com>; Batami Baskin <bbaskin@whlaw.com>; Myles Shaw <mshaw@whlaw.com>; Lynn Lagarde <llagarde@whlaw.com>; Reina Dimanche <rdimanche@whlaw.com>

Cc: Atkins, Robert A <ratkins@paulweiss.com>; Rubin, Jacqueline P <jrubin@paulweiss.com>; Smith, Kyle <ksmith@paulweiss.com>; Luskey, Randy <rluskey@paulweiss.com>; Phillips, Jessica E <jphillips@paulweiss.com>; Grusauskas, Caitlin E <cgrusauskas@paulweiss.com>; Wolf, Marc Price <mpricewolf@paulweiss.com>; Murray, Louis <lmurray@paulweiss.com>

Subject: MDL 3084 - Letter re Compliance with PTO 10 and the Court's November 18, 2024 Order

Counsel,

Please see the attached correspondence.

Best,

Ridan

Ridan Cunningham | Associate

Paul, Weiss, Rifkind, Wharton & Garrison LLP

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EXHIBIT C-1

Plaintiff	Date Complaint Was Filed	Non-Compliance with November 18, 2024 Order	Date Plaintiff Last Submitted a Signed Verification
WHB 1966, No. 3:24-cv-04546, MDLC ID 1479	7/27/2024	Required to Provide Third-Party Contact Information in Response to Question 30.a	12/11/2024
WHB 1882, No. 3:24-cv-04813, MDLC ID 1531	8/7/2024	Unverified Amended PFS	N/A
WHB 1027, No. 3:24-cv-04820, MDLC ID 1533	8/7/2024	Unverified Second Amended PFS	N/A
WHB 928, No. 3:24-cv-04825, MDLC ID 1535	8/7/2024	Unverified Second Amended PFS	N/A
WHB 188, No. 3:24-cv-04834, MDLC ID 1539	8/7/2024	Unverified Second Amended PFS	12/16/2024
WHB 1682, No. 3:24-cv-04835, MDLC ID 1540	8/7/2024	Unverified Amended PFS	N/A
WHB 531, No. 3:24-cv-04846, MDLC ID 1543	8/7/2024	Unverified Amended PFS	N/A
WHB 860, No. 3:24-cv-04845, MDLC ID 1549	8/7/2024	Unverified Amended PFS	N/A

WHB 511, No. 3:24-cv-04842, MDLC ID 1551	8/7/2024	Unverified Second Amended PFS	N/A
WHB 1023, No. 3:24-cv-04877, MDLC ID 1563	8/8/2024	Unverified Amended PFS	N/A
WHB 196, No. 3:24-cv-04886, MDLC ID 1573	8/8/2024	Unverified Amended PFS	10/15/2024
WHB 1017, No. 3:24-cv-04806, MDLC ID 1583	8/7/2024	Unverified Amended PFS	N/A
WHB 1399, No. 3:24-cv-04811, MDLC ID 1585	8/7/2024	Unverified Second Amended PFS	12/9/2024
WHB 1835, No. 3:24-cv-04824, MDLC ID 1590	8/7/2024	Unverified Second Amended PFS	12/13/2024
WHB 1293, No. 3:24-cv-04817, MDLC ID 1593	8/7/2024	Unverified Amended PFS	N/A
WHB 333, No. 3:24-cv-04905, MDLC ID 1595	8/8/2024	Unverified Amended PFS	N/A
WHB 1658, No. 3:24-cv-04907, MDLC ID 1597	8/8/2024	Unverified Amended PFS	N/A

WHB 56, No. 3:24-cv-04908, MDLC ID 1598	8/8/2024	Unverified Amended PFS	N/A
WHB 317, No. 3:24-cv-04853, MDLC ID 1604	8/8/2024	Unverified Second Amended PFS	N/A
WHB 1951, No. 3:24-cv-04895, MDLC ID 1609	8/8/2024	Required to Provide Third-Party Contact Information in Response to Questions 23.a and 30.a	10/24/2024
WHB 700, No. 3:24-cv-04899, MDLC ID 1612	8/8/2024	Unverified Amended PFS	N/A
WHB 526, No. 3:24-cv-04901, MDLC ID 1614	8/8/2024	Unverified Amended PFS	N/A
WHB 1002, No. 3:24-cv-04885, MDLC ID 1627	8/8/2024	Unverified Amended PFS	N/A
WHB 203, No. 3:24-cv-04912, MDLC ID 1630	8/8/2024	Unverified Original PFS; Required to Provide Third-Party Contact Information in Response to Question 30.a; Required to Supplement Answers to Questions 7 and 40.a	N/A

WHB 689, No. 3:24-cv-04965, MDLC ID 1631	8/9/2024	Unverified Amended PFS	N/A
WHB 1497, No. 3:24-cv-04891, MDLC ID 1632	8/8/2024	Unverified Amended PFS	N/A
WHB 1387, No. 3:24-cv-04958, MDLC ID 1635	8/9/2024	Unverified Amended PFS	N/A
WHB 1123, No. 3:24-cv-04850, MDLC ID 1659	8/8/2024	Unverified Amended PFS	N/A
WHB 950, No. 3:24-cv-04931, MDLC ID 1681	8/9/2024	Unverified Second Amended PFS	10/25/2024
WHB 1873, No. 3:24-cv-04933, MDLC ID 1682	8/9/2024	Unverified Amended PFS	N/A
WHB1619, No. 3:24-cv-04961, MDLC ID 1690	8/9/2024	Unverified Amended PFS	N/A
WHB 1847, No. 3:24-cv-04945, MDLC ID 1693	8/9/2024	Unverified Second Amended PFS	12/18/2024
WHB 696, No. 3:24-cv-04979, MDLC ID 1695	8/9/2024	Unverified Amended PFS	N/A

WHB175, No. 3:24-cv-04982, MDLC ID 1697	8/9/2024	Unverified Second Amended PFS; Required to Provide Third-Party Contact Information in Response to Questions 23.a and 30.a	N/A
WHB 530, No. 3:24-cv-05091, MDLC ID 1711	8/13/2024	Unverified Amended PFS	N/A
WHB 649, No. 3:24-cv-05095, MDLC ID 1712	8/13/2024	Unverified Amended PFS	10/15/2024
WHB 1489, No. 3:24-cv-05093, MDLC ID 1715	8/13/2024	Unverified Second Amended PFS	12/17/2024
WHB 862, No. 3:24-cv-05097, MDLC ID 1717	8/13/2024	Unverified Amended PFS	10/29/2024
WHB 1845, No. 3:24-cv-05015, MDLC ID 1725	8/10/2024	Unverified Amended PFS	N/A
WHB 1900, No. 3:24-cv-05031, MDLC ID 1726	8/12/2024	Unverified Amended PFS	N/A
WHB 1007, No. 3:24-cv-05023, MDLC ID 1731	8/12/2024	Unverified Amended PFS	N/A

WHB 1269, No. 3:24-cv-05025, MDLC ID 1732	8/12/2024	Unverified Amended PFS	N/A
WHB 676, No. 3:24-cv-05024, MDLC ID 1734	8/12/2024	Unverified Amended PFS	N/A
WHB 1941, No. 3:24-cv-05032, MDLC ID 1739	8/12/2024	Unverified Amended PFS	N/A
WHB 999, No. 3:24-cv-05036, MDLC ID 1748	8/12/2024	Unverified Amended PFS	N/A
WHB 1431, No. 3:24-cv-05057, MDLC ID 1759	8/12/2024	Unverified Amended PFS	N/A
WHB 12, No. 3:24-cv-05058, MDLC ID 1760	8/12/2024	Unverified Second Amended PFS	N/A
WHB 1919, No. 3:24-cv-05059, MDLC ID 1761	8/12/2024	Unverified Amended PFS	N/A
WHB 979, No. 3:24-cv-05082, MDLC ID 1770	8/13/2024	Unverified Second Amended PFS	N/A
WHB 666, No. 3:24-cv-05127, MDLC ID 1788	8/14/2024	Unverified Amended PFS	N/A

WHB 504, No. 3:24-cv-05243, MDLC ID 1838	8/16/2024	Unverified Amended PFS	N/A
WHB 823, No. 3:24-cv-05041, MDLC ID 1845	8/12/2024	Unverified Amended PFS	N/A
WHB 701, No. 3:24-cv-05138, MDLC ID 1869	8/14/2024	Required to Provide Third-Party Contact Information in Response to Question 30.a; Required to Supplement Answer to Question 40.a	11/1/2024
WHB 1617, No. 3:24-cv-05125, MDLC ID 1877	8/14/2024	Required to Provide Third-Party Contact Information in Response to Question 30.a; Required to Supplement Answer to Question 7	10/30/2024
WHB 1832, No. 3:24-cv-05305, MDLC ID 1893	8/16/2024	Unverified Original PFS	N/A
WHB 451, No. 3:24-cv-05256, MDLC ID 1897	8/16/2024	Unverified Original PFS; Required to Supplement Answer to Question 10.a	N/A

WHB 1655, No. 3:24-cv-05223, MDLC ID 1903	8/16/2024	Unverified Amended PFS	10/31/2024
WHB 373, No. 3:24-cv-05224, MDLC ID 1910	8/16/2024	Unverified Amended PFS	N/A
WHB 428, No. 3:24-cv-05236, MDLC ID 1917	8/16/2024	Unverified Amended PFS	N/A
WHB 703, No. 3:24-cv-05361, MDLC ID 1925	8/19/2024	Unverified Amended PFS	N/A
WHB 1272, No. 3:24-cv-05366, MDLC ID 1926	8/19/2024	Unverified Second Amended PFS	N/A
WHB 873, No. 3:24-cv-05351, MDLC ID 1931	8/19/2024	Unverified Amended PFS	N/A
WHB 994, No. 3:24-cv-05452, MDLC ID 1937	8/20/2024	Unverified Amended PFS	10/24/2024
WHB 662, No. 3:24-cv-05355, MDLC ID 1940	8/19/2024	Unverified Amended PFS	N/A
WHB 1888, No. 3:24-cv-05457, MDLC ID 1941	8/20/2024	Unverified Amended PFS	10/15/2024

WHB 335, No. 3:24-cv-05460, MDLC ID 1942	8/20/2024	Unverified Amended PFS	10/30/2024
WHB 1048, No. 3:24-cv-05462, MDLC ID 1943	8/20/2024	Unverified Amended PFS	N/A
WHB 1021, No. 3:24-cv-05466, MDLC ID 1947	8/20/2024	Unverified Second Amended PFS	10/15/2024
WHB 1661, No. 3:24-cv-05468, MDLC ID 1948	8/20/2024	Unverified Amended PFS	N/A
WHB 1443, No. 3:24-cv-05472, MDLC ID 1950	8/20/2024	Unverified Second Amended PFS	10/17/2024
WHB 1540, No. 3:24-cv-05449, MDLC ID 1959	8/20/2024	Unverified Amended PFS	N/A
WHB 1618, No. 3:24-cv-05572, MDLC ID 1964	8/21/2024	Unverified Second Amended PFS; Required to Provide Third-Party Contact Information in Response to Question 30.a	12/13/2024
WHB 981, No. 3:24-cv-05573, MDLC ID 1967	8/21/2024	Unverified Original PFS	N/A

WHB 1596, No. 3:24-cv-05473, MDLC ID 1969	8/20/2024	Required to Supplement Answer to Question 40.a	12/10/2024
WHB 1457, No. 3:24-cv-05576, MDLC ID 1971	8/21/2024	Unverified Amended PFS	N/A
WHB 1043, No. 3:24-cv-05501, MDLC ID 1972	8/20/2024	Unverified Second Amended PFS	N/A
WHB 1338, No. 3:24-cv-05434, MDLC ID 1974	8/20/2024	Unverified Amended PFS	N/A
WHB 473, No. 3:24-cv-05459, MDLC ID 1980	8/20/2024	Unverified Amended PFS	N/A
WHB 406, No. 3:24-cv-05560, MDLC ID 1985	8/21/2024	Unverified Amended PFS	N/A
WHB 1414, No. 3:24-cv-05495, MDLC ID 1988	8/20/2024	Unverified Original PFS; Required to Provide Third-Party Contact Information in Response to Question 30.a; Required to Supplement Answer to Question 40.a	N/A

WHB 1468, No. 3:24-cv-05500, MDLC ID 1989	8/20/2024	Unverified Amended PFS	N/A
WHB 1044, No. 3:24-cv-05553, MDLC ID 2054	8/21/2024	Unverified Second Amended PFS; Required to Supplement Answer to Question 40.a	12/17/2024
WHB 1324, No. 3:24-cv-05561, MDLC ID 2055	8/21/2024	Unverified Amended PFS	N/A
WHB 1840, No. 3:24-cv-05554, MDLC ID 2056	8/21/2024	Unverified Amended PFS	10/31/2024
WHB 1677, No. 3:24-cv-05556, MDLC ID 2057	8/21/2024	Unverified Amended PFS	N/A
WHB 1860, No. 3:24-cv-05568, MDLC ID 2061	8/21/2024	Unverified Amended PFS	N/A
WHB 1010, No. 3:24-cv-05773, MDLC ID 2064	8/23/2024	Unverified Second Amended PFS	12/5/2024
WHB 935, No. 3:24-cv-05776, MDLC ID 2065	8/23/2024	Unverified Amended PFS	N/A
WHB 1484, No. 3:24-cv-05779, MDLC ID 2066	8/23/2024	Unverified Amended PFS	N/A

WHB 375, No. 3:24-cv-05781, MDLC ID 2067	8/23/2024	Unverified Original PFS; Required to Supplement Answer to Question 7	N/A
WHB 1659, No. 3:24-cv-05565, MDLC ID 2070	8/21/2024	Unverified Amended PFS	N/A
WHB 345, No. 3:24-cv-05766, MDLC ID 2071	8/23/2024	Unverified Amended PFS	10/30/2024
WHB 706, No. 3:24-cv-05771, MDLC ID 2075	8/23/2024	Unverified Amended PFS	10/30/2024
WHB 678, No. 3:24-cv-05961, MDLC ID 2078	8/26/2024	Unverified Second Amended PFS	12/11/2024
WHB 1381, No. 3:24-cv-05603, MDLC ID 2133	8/21/2024	Unverified Amended PFS	N/A
WHB 632, No. 3:24-cv-05604, MDLC ID 2134	8/21/2024	Unverified Second Amended PFS	N/A
WHB 517, No. 3:24-cv-05608, MDLC ID 2135	8/21/2024	Unverified Amended PFS	N/A
WHB 1880, No. 3:24-cv-05602, MDLC ID 2139	8/21/2024	Unverified Amended PFS	10/16/2024

WHB 1544, No. 3:24-cv-05622, MDLC ID 2146	8/21/2024	Unverified Amended PFS	N/A
WHB 438, No. 3:24-cv-05631, MDLC ID 2148	8/21/2024	Unverified Amended PFS	N/A
WHB 393, No. 3:24-cv-05633, MDLC ID 2150	8/21/2024	Unverified Second Amended PFS	N/A
WHB 349, No. 3:24-cv-05636, MDLC ID 2152	8/21/2024	Unverified Amended PFS	N/A
WHB 1053, No. 3:24-cv-05612, MDLC ID 2154	8/21/2024	Unverified Amended PFS.	10/28/2024
WHB 1552, No. 3:24-cv-05599, MDLC ID 2158	8/21/2024	Unverified Amended PFS	N/A
WHB 465, No. 3:24-cv-05617, MDLC ID 2162	8/21/2024	Unverified Amended PFS	N/A
WHB 1334, No. 3:24-cv-05624, MDLC ID 2165	8/21/2024	Unverified Amended PFS	11/7/2024
WHB 1348, No. 3:24-cv-05669, MDLC ID 2174	8/22/2024	Unverified Amended PFS	N/A

WHB 1611, No. 3:24-cv-05665, MDLC ID 2176	8/22/2024	Unverified Amended PFS	N/A
WHB 1416, No. 3:24-cv-05667, MDLC ID 2177	8/22/2024	Unverified Amended PFS	11/1/2024
WHB 435, No. 3:24-cv-05668, MDLC ID 2179	8/22/2024	Unverified Amended PFS	N/A
WHB 1556, No. 3:24-cv-05986, MDLC ID 2180	8/26/2024	Unverified Amended PFS	N/A
WHB 1947, No. 3:24-cv-05714, MDLC ID 2183	8/22/2024	Unverified Original PFS	N/A
WHB 946, No. 3:24-cv-05698, MDLC ID 2184	8/22/2024	Unverified Amended PFS; Required to Provide Third-Party Contact Information in Response to Question 30.a	N/A
WHB 505, No. 3:24-cv-05709, MDLC ID 2186	8/22/2024	Unverified Amended PFS	N/A
WHB 1142, No. 3:24-cv-05712, MDLC ID 2187	8/22/2024	Unverified Amended PFS	N/A

WHB 1057, No. 3:24-cv-05715, MDLC ID 2189	8/22/2024	Unverified Amended PFS	N/A
WHB 1470, No. 3:24-cv-05716, MDLC ID 2190	8/22/2024	Unverified Amended PFS	N/A
WHB 1843, No. 3:24-cv-05693, MDLC ID 2193	8/22/2024	Unverified Amended PFS	N/A
WHB 856, No. 3:24-cv-05699, MDLC ID 2194	8/22/2024	Unverified Original PFS	N/A
WHB 1398, No. 3:24-cv-05705, MDLC ID 2195	8/22/2024	Unverified Original PFS	N/A
WHB 871, No. 3:24-cv-05770, MDLC ID 2196	8/23/2024	Unverified Amended PFS	N/A
WHB 1317, No. 3:24-cv-05791, MDLC ID 2199	8/23/2024	Unverified Second Amended PFS	N/A
WHB 991, No. 3:24-cv-05959, MDLC ID 2206	8/26/2024	Unverified Amended PFS	N/A
WHB 884, No. 3:24-cv-05948, MDLC ID 2207	8/26/2024	Unverified Amended PFS	N/A

WHB 513, No. 3:24-cv-05951, MDLC ID 2208	8/26/2024	Unverified Amended PFS; Required to Provide Third-Party Contact Information in Response to Question 30.a	N/A
WHB 1999, No. 3:24-cv-07048, MDLC ID 2629	10/8/2024	Unverified Amended PFS	N/A
WHB 2000, No. 3:24-cv-07183, MDLC ID 2630	10/15/2024	Unverified Amended PFS	N/A

EXHIBIT D

From: [Murray, Louis](#)
To: [Walt Cubberly](#); [Margret Lecocke](#); [Brian Abramson](#); [John Eddie Williams Jr.](#); [Batami Baskin](#); [Myles Shaw](#); [Lynn Lagarde, JD](#); [Reina Dimanche](#)
Cc: [Atkins, Robert A](#); [Smith, Kyle](#); [Rubin, Jacqueline P](#); [Luskey, Randy](#); [Phillips, Jessica E](#); [Grusauskas, Caitlin E](#); [Wolf, Marc Price](#); [Tipton, Alex](#); [Doolan, Devin J](#); [Wollmuth, Jack](#); [Cunningham, Ridan](#)
Subject: RE: MDL 3084 - Letter re Compliance with PTO 10 and the Court's November 18, 2024 Order
Date: Friday, January 10, 2025 2:22:34 PM
Attachments: [image001.png](#)
[image002.png](#)
[image003.png](#)
[image004.png](#)
[image005.png](#)
[2025.01.10 - List of WHB Plaintiffs Who Have Not Complied with 11.18 Order.docx](#)
[Redline - 2025.01.03 - List of WHB Plaintiffs Who Have Not Complied with 11.18 Order and 2025.01.10 - List of WHB Plaintiffs Who Have Not Complied with 11.18 Or.pdf](#)

Hi Walt,

Here is another revised list of Plaintiffs represented by Williams Hart who have not conformed their PFS submissions with the Court's November 18, 2024 Order. These revisions account for your firm's recent filings. We have also removed the Plaintiffs who have submitted a signed verification at some point after the Court's November 18 Order because, as discussed below, we have agreed to extend those Plaintiffs' deadline to comply with the Court's Order until January 17, 2025. We will follow up separately with a list of those Plaintiffs and what deficiencies remain outstanding.

I look forward to discussing the remaining 82 Plaintiffs identified in this list later this afternoon.

Best,
Louis

Louis A. Murray | Associate

Paul, Weiss, Rifkind, Wharton & Garrison LLP

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From: Walt Cubberly <wcubberly@whlaw.com>

Sent: Monday, January 6, 2025 9:24 PM

To: Murray, Louis <lmurray@paulweiss.com>; Margret Lecocke <mlecocke@whlaw.com>; Brian Abramson <babramson@whlaw.com>; John Eddie Williams Jr. <jjwilliams@whlaw.com>; Batami Baskin <bbaskin@whlaw.com>; Myles Shaw <mshaw@whlaw.com>; Lynn Lagarde <llagarde@whlaw.com>; Reina Dimanche <rdimanche@whlaw.com>

Cc: Atkins, Robert A <ratkins@paulweiss.com>; Smith, Kyle <ksmith@paulweiss.com>; Rubin, Jacqueline P <jrubin@paulweiss.com>; Luskey, Randy <rluskey@paulweiss.com>; Phillips, Jessica E <jphillips@paulweiss.com>; Grusauskas, Caitlin E <cgrusauskas@paulweiss.com>; Wolf, Marc Price <mpricewolf@paulweiss.com>; Tipton, Alex <atipton@paulweiss.com>; Doolan, Devin J <ddoolan@paulweiss.com>; Wollmuth, Jack <JWollmuth@paulweiss.com>; Cunningham, Ridan <rcunningham@paulweiss.com>

Subject: Re: MDL 3084 - Letter re Compliance with PTO 10 and the Court's November 18, 2024 Order

That works. Thanks.

Walt

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Walt Cubberly

Attorney

Direct: [713-230-2244](tel:713-230-2244)

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WKHBLLP

From: Murray, Louis <lmurray@paulweiss.com>

Sent: Monday, January 6, 2025 7:38:40 PM

To: Walt Cubberly <wcubberly@whlaw.com>; Margret Lecocke <mlecocke@whlaw.com>; Brian Abramson <babramson@whlaw.com>; John Eddie Williams Jr. <jwilliams@whlaw.com>; Batami Baskin <bbaskin@whlaw.com>; Myles Shaw <mshaw@whlaw.com>; Lynn Lagarde <llagarde@whlaw.com>; Reina Dimanche <rdimanche@whlaw.com>

Cc: Atkins, Robert A <ratkins@paulweiss.com>; Smith, Kyle <ksmith@paulweiss.com>; Rubin, Jacqueline P <jrubin@paulweiss.com>; Luskey, Randy <rluskey@paulweiss.com>; Phillips, Jessica E <jphillips@paulweiss.com>; Grusauskas, Caitlin E <cgrusauskas@paulweiss.com>; Wolf, Marc Price <mpricewolf@paulweiss.com>; Tipton, Alex <atipton@paulweiss.com>; Doolan, Devin J <ddoolan@paulweiss.com>; Wollmuth, Jack <JWollmuth@paulweiss.com>; Cunningham, Ridan <rcunningham@paulweiss.com>

Subject: RE: MDL 3084 - Letter re Compliance with PTO 10 and the Court's November 18, 2024 Order

Hi Walt,

Yes, we can meet and confer on Friday afternoon. Are you free at 3:00 PM CT?

Best,
Louis

Louis A. Murray | Associate

Paul, Weiss, Rifkind, Wharton & Garrison LLP

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+1 212 373 2749 (Direct Phone)

lmurray@paulweiss.com | www.paulweiss.com

From: Walt Cubberly <wcubberly@whlaw.com>

Sent: Monday, January 6, 2025 11:26 AM

To: Murray, Louis <lmurray@paulweiss.com>; Margret Lecoche <mlecoche@whlaw.com>; Brian Abramson <babramson@whlaw.com>; John Eddie Williams Jr. <jwilliams@whlaw.com>; Batami Baskin <bbaskin@whlaw.com>; Myles Shaw <mshaw@whlaw.com>; Lynn Lagarde <llagarde@whlaw.com>; Reina Dimanche <rdimanche@whlaw.com>

Cc: Atkins, Robert A <ratkins@paulweiss.com>; Smith, Kyle <ksmith@paulweiss.com>; Rubin, Jacqueline P <jrubin@paulweiss.com>; Luskey, Randy <rluskey@paulweiss.com>; Phillips, Jessica E <jphillips@paulweiss.com>; Grusauskas, Caitlin E <cgrusauskas@paulweiss.com>; Wolf, Marc Price <mpricewolf@paulweiss.com>; Tipton, Alex <atipton@paulweiss.com>; Doolan, Devin J <ddoolan@paulweiss.com>; Wollmuth, Jack <JWollmuth@paulweiss.com>; Cunningham, Ridan <rcunningham@paulweiss.com>

Subject: RE: MDL 3084 - Letter re Compliance with PTO 10 and the Court's November 18, 2024 Order

I now have to travel on Wednesday. Can we speak Friday afternoon? Thanks.

Walt

Walt Cubberly

Attorney

Direct: [713-230-2244](tel:713-230-2244)

wcubberly@whlaw.com

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WKHBLLP

From: Murray, Louis <lmurray@paulweiss.com>

Sent: Friday, January 3, 2025 8:25 AM

To: Walt Cubberly <wcubberly@whlaw.com>; Margret Lecoche <mlecoche@whlaw.com>; Brian Abramson <babramson@whlaw.com>; John Eddie Williams Jr. <jwilliams@whlaw.com>; Batami Baskin <bbaskin@whlaw.com>; Myles Shaw <mshaw@whlaw.com>; Lynn Lagarde <llagarde@whlaw.com>; Reina Dimanche <rdimanche@whlaw.com>

Cc: Atkins, Robert A <ratkins@paulweiss.com>; Smith, Kyle <ksmith@paulweiss.com>; Rubin, Jacqueline P <jrubin@paulweiss.com>; Luskey, Randy <rluskey@paulweiss.com>; Phillips, Jessica E <jphillips@paulweiss.com>; Grusauskas, Caitlin E <cgrusauskas@paulweiss.com>; Wolf, Marc Price <mpricewolf@paulweiss.com>; Tipton, Alex <atipton@paulweiss.com>; Doolan, Devin J <ddoolan@paulweiss.com>; Wollmuth, Jack <JWollmuth@paulweiss.com>; Cunningham, Ridan <rcunningham@paulweiss.com>

Subject: RE: MDL 3084 - Letter re Compliance with PTO 10 and the Court's November 18, 2024 Order

Hi Walt,

Thank you for meeting and conferring yesterday. Here is a revised list of Plaintiffs represented by Williams Hart & Boundas who have not conformed their PFS submissions with the Court's November 18, 2024 Order. The list now identifies when each Plaintiff last submitted a signed verification to MDL Centrality.

Our records show that 96 of the 127 Plaintiffs at issue have never submitted a signed verification. 20 of the 31 Plaintiffs who have submitted a signed verification at some point last submitted one before the Court's November 18 Order. As for the remaining 11 Plaintiffs who have submitted a signed verification after the November 18 Order, we are willing to grant those individuals a further extension of the Court's December 18, 2024 deadline—until January 17, 2025—to cure the remaining outstanding deficiencies.

Please let us know if you disagree with the information listed in this spreadsheet for any individual case. Please also send us a full list of Plaintiffs who we should remove from the list because they will not be proceeding in the MDL or because, due to factually specific information regarding that Plaintiff's unique circumstances, you believe an extension is warranted. Finally, please let us know what time you are available to meet and confer further on Wednesday.

Best,
Louis

Louis A. Murray | Associate

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From: Murray, Louis

Sent: Thursday, January 2, 2025 10:04 AM

To: Walt Cubberly <wcubberly@whlaw.com>; Margret Lecoche <mlecoche@whlaw.com>; Brian Abramson <babramson@whlaw.com>; John Eddie Williams Jr. <jwilliams@whlaw.com>; Batami Baskin <bbaskin@whlaw.com>; Myles Shaw <mshaw@whlaw.com>; Lynn Lagarde <llagarde@whlaw.com>; Reina Dimanche <rdimanche@whlaw.com>

Cc: Atkins, Robert A <ratkins@paulweiss.com>; Rubin, Jacqueline P <jrubin@paulweiss.com>; Luskey, Randy <rluskey@paulweiss.com>; Phillips, Jessica E <jphillips@paulweiss.com>; Grusauskas, Caitlin E <cgrusauskas@paulweiss.com>; Wolf, Marc Price <mpricewolf@paulweiss.com>; Tipton, Alex <atipton@paulweiss.com>; Doolan, Devin J <ddoolan@paulweiss.com>; Wollmuth, Jack <JWollmuth@paulweiss.com>; Cunningham, Ridan <rcunningham@paulweiss.com>; Smith, Kyle <ksmith@paulweiss.com>

Subject: RE: MDL 3084 - Letter re Compliance with PTO 10 and the Court's November 18, 2024 Order

Hi Walt,

I have attached an updated list of Plaintiffs represented by Williams Hart & Boundas who have not conformed their PFS submissions with the Court's November 18, 2024 Order. This list accounts for your firm's recent filings. We look forward to discussing further later today.

Best,
Louis

Louis A. Murray | Associate

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From: Murray, Louis

Sent: Friday, December 27, 2024 2:40 PM

To: Walt Cubberly <wcubberly@whlaw.com>; Margret Lecoche <mlecoche@whlaw.com>; Brian Abramson <babramson@whlaw.com>; John Eddie Williams Jr. <jwilliams@whlaw.com>; Batami Baskin <bbaskin@whlaw.com>; Myles Shaw <mshaw@whlaw.com>; Lynn Lagarde <llagarde@whlaw.com>; Reina Dimanche <rdimanche@whlaw.com>

Cc: Atkins, Robert A <ratkins@paulweiss.com>; Rubin, Jacqueline P <jrubin@paulweiss.com>; Luskey, Randy <rluskey@paulweiss.com>; Phillips, Jessica E <jphillips@paulweiss.com>; Grusauskas, Caitlin E <cgrusauskas@paulweiss.com>; Wolf, Marc Price <mpricewolf@paulweiss.com>; Tipton, Alex <atipton@paulweiss.com>; Doolan, Devin J <ddoolan@paulweiss.com>; Wollmuth, Jack <JWollmuth@paulweiss.com>; Cunningham, Ridan <rcunningham@paulweiss.com>; Smith, Kyle

<ksmith@paulweiss.com>

Subject: RE: MDL 3084 - Letter re Compliance with PTO 10 and the Court's November 18, 2024 Order

Hi Walt,

We are free at 4:00 PM CT on Thursday. I have circulated an invite.

Best,
Louis

Louis A. Murray | Associate

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From: Smith, Kyle <ksmith@paulweiss.com>

Sent: Friday, December 27, 2024 1:59 PM

To: Walt Cubberly <wcubberly@whlaw.com>; Murray, Louis <lmurray@paulweiss.com>; Margret Lecoche <mlecoche@whlaw.com>; Brian Abramson <babramson@whlaw.com>; John Eddie Williams Jr. <jwilliams@whlaw.com>; Batami Baskin <bbaskin@whlaw.com>; Myles Shaw <mshaw@whlaw.com>; Lynn Lagarde <llagarde@whlaw.com>; Reina Dimanche <rdimanche@whlaw.com>

Cc: Atkins, Robert A <ratkins@paulweiss.com>; Rubin, Jacqueline P <jrubin@paulweiss.com>; Luskey, Randy <rluskey@paulweiss.com>; Phillips, Jessica E <jphillips@paulweiss.com>; Grusauskas, Caitlin E <cgrusauskas@paulweiss.com>; Wolf, Marc Price <mpricewolf@paulweiss.com>; Tipton, Alex <atipton@paulweiss.com>; Doolan, Devin J <ddoolan@paulweiss.com>; Wollmuth, Jack <JWollmuth@paulweiss.com>; Cunningham, Ridan <rcunningham@paulweiss.com>

Subject: RE: MDL 3084 - Letter re Compliance with PTO 10 and the Court's November 18, 2024 Order

Good afternoon Walt — PTO 8 in the MDL requires the meet and confer to take place within 3 business days of the notification. Next Thursday and Friday are after that timeframe.

That being said, assuming you are requesting the professional courtesy of an accommodation based upon the intervening holidays, we are willing to work with you on that and consent to your request, and schedule for next Thursday/Friday. Louis will let you know re: the times you suggested.

Thank you,
Kyle

Kyle Smith | Partner

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Pronouns: He/Him

From: Walt Cubberly <wcubberly@whlaw.com>

Date: Friday, Dec 27, 2024 at 11:54 AM

To: Murray, Louis <lmurray@paulweiss.com>, Margret Lecocke <mlecocke@whlaw.com>, Brian Abramson <babramson@whlaw.com>, John Eddie Williams Jr. <jwilliams@whlaw.com>, Batami Baskin <bbaskin@whlaw.com>, Myles Shaw <mshaw@whlaw.com>, Lynn Lagarde <llagarde@whlaw.com>, Reina Dimanche <rdimanche@whlaw.com>

Cc: Atkins, Robert A <ratkins@paulweiss.com>, Rubin, Jacqueline P <jrubin@paulweiss.com>, Luskey, Randy <rluskey@paulweiss.com>, Phillips, Jessica E <jphillips@paulweiss.com>, Smith, Kyle <ksmith@paulweiss.com>, Grusauskas, Caitlin E <cgrusauskas@paulweiss.com>, Wolf, Marc Price <mpricewolf@paulweiss.com>, Tipton, Alex <atipton@paulweiss.com>, Doolan, Devin J <ddoolan@paulweiss.com>, Wollmuth, Jack <JWollmuth@paulweiss.com>, Cunningham, Ridan <rcunningham@paulweiss.com>

Subject: RE: MDL 3084 - Letter re Compliance with PTO 10 and the Court's November 18, 2024 Order

Louis, we can be available at 4:00 Central on Thursday or Friday between 10:00 and 11:00 Central. Thanks.

Walt

Walt Cubberly

Attorney

Direct: [713-230-2244](tel:713-230-2244)

wcubberly@whlaw.com

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WKHBLLP

From: Murray, Louis <lmurray@paulweiss.com>

Sent: Friday, December 27, 2024 9:14 AM

To: Walt Cubberly <wcubberly@whlaw.com>; Margret Lecocke <mlecocke@whlaw.com>; Brian Abramson <babramson@whlaw.com>; John Eddie Williams Jr. <jwilliams@whlaw.com>; Batami Baskin <bbaskin@whlaw.com>; Myles Shaw <mshaw@whlaw.com>; Lynn Lagarde <llagarde@whlaw.com>; Reina Dimanche <rdimanche@whlaw.com>

Cc: Atkins, Robert A <ratkins@paulweiss.com>; Rubin, Jacqueline P <jrubin@paulweiss.com>; Luskey, Randy <rluskey@paulweiss.com>; Phillips, Jessica E <jphillips@paulweiss.com>; Smith, Kyle <ksmith@paulweiss.com>; Grusauskas, Caitlin E <cgrusauskas@paulweiss.com>; Wolf, Marc Price <mpricewolf@paulweiss.com>; Tipton, Alex <atipton@paulweiss.com>; Doolan, Devin J <ddoolan@paulweiss.com>; Wollmuth, Jack <JWollmuth@paulweiss.com>; Cunningham, Ridan <rcunningham@paulweiss.com>

Subject: RE: MDL 3084 - Letter re Compliance with PTO 10 and the Court's November 18, 2024 Order

Hi Walt,

I am following up on this message. Are you or someone else from Williams Hart able to meet and confer at noon CT on Monday? If not, please identify other times next week when you are available.

Best,
Louis

Louis A. Murray | Associate

Paul, Weiss, Rifkind, Wharton & Garrison LLP

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From: Smith, Kyle <ksmith@paulweiss.com>

Sent: Tuesday, December 24, 2024 11:14 PM

To: Walt Cubberly <wcubberly@whlaw.com>; Murray, Louis <lmurray@paulweiss.com>; Margret Lecocke <mlecocke@whlaw.com>; Brian Abramson <babramson@whlaw.com>; John Eddie Williams Jr. <jwilliams@whlaw.com>; Batami Baskin <bbaskin@whlaw.com>; Myles Shaw <mshaw@whlaw.com>; Lynn Lagarde <llagarde@whlaw.com>; Reina Dimanche <rdimanche@whlaw.com>

Cc: Atkins, Robert A <ratkins@paulweiss.com>; Rubin, Jacqueline P <jrubin@paulweiss.com>; Luskey, Randy <rluskey@paulweiss.com>; Phillips, Jessica E <jphillips@paulweiss.com>; Grusauskas, Caitlin E <cgrusauskas@paulweiss.com>; Wolf, Marc Price <mpricewolf@paulweiss.com>; Tipton, Alex <atipton@paulweiss.com>; Doolan, Devin J <ddoolan@paulweiss.com>; Wollmuth, Jack <JWollmuth@paulweiss.com>; Cunningham, Ridan <rcunningham@paulweiss.com>

Subject: RE: MDL 3084 - Letter re Compliance with PTO 10 and the Court's November 18, 2024 Order

Counsel:

Your commentary is completely inappropriate and baseless.

We are available to confer at an appropriate and convenient time after the Christmas holiday, as Louis indicated — whether it be later this week or early next week.

Regards,
Kyle

Kyle Smith | Partner

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Pronouns: He/Him

From: Walt Cubberly <wcubberly@whlaw.com>

Date: Tuesday, Dec 24, 2024 at 8:04 PM

To: Murray, Louis <murray@paulweiss.com>, Margret Lecocke <mlecocke@whlaw.com>, Brian Abramson <babramson@whlaw.com>, John Eddie Williams Jr. <jwilliams@whlaw.com>, Batami Baskin <bbaskin@whlaw.com>, Myles Shaw <mshaw@whlaw.com>, Lynn Lagarde <llagarde@whlaw.com>, Reina Dimanche <rdimanche@whlaw.com>

Cc: Atkins, Robert A <ratkins@paulweiss.com>, Rubin, Jacqueline P <jrubin@paulweiss.com>, Smith, Kyle <ksmith@paulweiss.com>, Luskey, Randy <rluskey@paulweiss.com>, Phillips, Jessica E <jphillips@paulweiss.com>, Grusauskas, Caitlin E <cgrusauskas@paulweiss.com>, Wolf, Marc Price <mpricewolf@paulweiss.com>, Tipton, Alex <atipton@paulweiss.com>, Doolan, Devin J <ddoolan@paulweiss.com>, Wollmuth, Jack <JWollmuth@paulweiss.com>, Cunningham, Ridan <rcunningham@paulweiss.com>

Subject: Re: MDL 3084 - Letter re Compliance with PTO 10 and the Court's November 18, 2024 Order

Louis,

It is Christmas Eve. And it is really unprofessional for you to do this.

Have a Happy Holidays.

Walt

Get [Outlook for iOS](#)

Walt Cubberly

Attorney

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WKHBLLP

From: Murray, Louis <lmurray@paulweiss.com>

Sent: Tuesday, December 24, 2024 8:37 PM

To: Walt Cubberly <wcubberly@whlaw.com>; Margret Lecocke <mlecocke@whlaw.com>; Brian Abramson <babramson@whlaw.com>; John Eddie Williams Jr. <jwilliams@whlaw.com>; Batami Baskin <bbaskin@whlaw.com>; Myles Shaw <mshaw@whlaw.com>; Lynn Lagarde <llagarde@whlaw.com>; Reina Dimanche <rdimanche@whlaw.com>

Cc: Atkins, Robert A <ratkins@paulweiss.com>; Rubin, Jacqueline P <jrubin@paulweiss.com>; Smith, Kyle <ksmith@paulweiss.com>; Luskey, Randy <rluskey@paulweiss.com>; Phillips, Jessica E <jphillips@paulweiss.com>; Grusauskas, Caitlin E <cgrusauskas@paulweiss.com>; Wolf, Marc Price <mpricewolf@paulweiss.com>; Tipton, Alex <atipton@paulweiss.com>; Doolan, Devin J <ddoolan@paulweiss.com>; Wollmuth, Jack <JWollmuth@paulweiss.com>; Cunningham, Ridan <rcunningham@paulweiss.com>

Subject: RE: MDL 3084 - Letter re Compliance with PTO 10 and the Court's November 18, 2024 Order

Counsel,

Uber requests a meet and confer to discuss the Plaintiffs listed in the attached Word document. These 141 individuals have not conformed their PFS submissions with the Court's November 18, 2024 Order.

Are you available at 1:00 PM CT on Thursday, December 26? If not, please propose other times when you would be available to meet and confer between Thursday, December 26 and Tuesday, December 31. As a reminder, per Pretrial Order No. 8, unless "both parties otherwise agree, the meet and confer process shall begin within three business days of a party making a request for the meet and confer conference."

Best,
Louis

Louis A. Murray | Associate

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From: Cunningham, Ridan <rcunningham@paulweiss.com>

Sent: Monday, December 9, 2024 1:45 PM

To: Walt Cubberly <wcubberly@whlaw.com>; Margret Lecoche <mlecoche@whlaw.com>; Brian Abramson <babramson@whlaw.com>; John Eddie Williams Jr. <jwilliams@whlaw.com>; Batami Baskin <bbaskin@whlaw.com>; Myles Shaw <mshaw@whlaw.com>; Lynn Lagarde <llagarde@whlaw.com>; Reina Dimanche <rdimanche@whlaw.com>

Cc: Atkins, Robert A <ratkins@paulweiss.com>; Rubin, Jacqueline P <jrubin@paulweiss.com>; Smith, Kyle <ksmith@paulweiss.com>; Luskey, Randy <rluskey@paulweiss.com>; Phillips, Jessica E <jphillips@paulweiss.com>; Grusauskas, Caitlin E <cgrusauskas@paulweiss.com>; Wolf, Marc Price <mpricewolf@paulweiss.com>; Murray, Louis <lmurray@paulweiss.com>

Subject: MDL 3084 - Letter re Compliance with PTO 10 and the Court's November 18, 2024 Order

Counsel,

Please see the attached correspondence.

Best,

Ridan

Ridan Cunningham | Associate

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EXHIBIT D-1

Plaintiff	Date Complaint Was Filed	Non-Compliance with November 18, 2024 Order	Date Plaintiff Last Submitted a Signed Verification
WHB 1027, No. 3:24-cv-04820, MDLC ID 1533	8/7/2024	Unverified Second Amended PFS	N/A
WHB 928, No. 3:24-cv-04825, MDLC ID 1535	8/7/2024	Unverified Second Amended PFS	N/A
WHB 531, No. 3:24-cv-04846, MDLC ID 1543	8/7/2024	Unverified Amended PFS	N/A
WHB 860, No. 3:24-cv-04845, MDLC ID 1549	8/7/2024	Unverified Amended PFS	N/A
WHB 511, No. 3:24-cv-04842, MDLC ID 1551	8/7/2024	Unverified Second Amended PFS	N/A
WHB 1023, No. 3:24-cv-04877, MDLC ID 1563	8/8/2024	Unverified Amended PFS	N/A
WHB 1017, No. 3:24-cv-04806, MDLC ID 1583	8/7/2024	Unverified Amended PFS	N/A
WHB 1293, No. 3:24-cv-04817, MDLC ID 1593	8/7/2024	Unverified Amended PFS	N/A

WHB 333, No. 3:24-cv-04905, MDLC ID 1595	8/8/2024	Unverified Amended PFS	N/A
WHB 1658, No. 3:24-cv-04907, MDLC ID 1597	8/8/2024	Unverified Amended PFS	N/A
WHB 700, No. 3:24-cv-04899, MDLC ID 1612	8/8/2024	Unverified Amended PFS	N/A
WHB 526, No. 3:24-cv-04901, MDLC ID 1614	8/8/2024	Unverified Amended PFS	N/A
WHB 203, No. 3:24-cv-04912, MDLC ID 1630	8/8/2024	Unverified Original PFS; Required to Provide Third-Party Contact Information in Response to Question 30.a; Required to Supplement Answers to Questions 7 and 40.a	N/A
WHB 689, No. 3:24-cv-04965, MDLC ID 1631	8/9/2024	Unverified Amended PFS	N/A
WHB 1497, No. 3:24-cv-04891, MDLC ID 1632	8/8/2024	Unverified Amended PFS	N/A

WHB 1387, No. 3:24-cv-04958, MDLC ID 1635	8/9/2024	Unverified Amended PFS	N/A
WHB 1123, No. 3:24-cv-04850, MDLC ID 1659	8/8/2024	Unverified Amended PFS	N/A
WHB 1873, No. 3:24-cv-04933, MDLC ID 1682	8/9/2024	Unverified Amended PFS	N/A
WHB1619, No. 3:24-cv-04961, MDLC ID 1690	8/9/2024	Unverified Amended PFS	N/A
WHB 696, No. 3:24-cv-04979, MDLC ID 1695	8/9/2024	Unverified Amended PFS	N/A
WHB175, No. 3:24-cv-04982, MDLC ID 1697	8/9/2024	Unverified Second Amended PFS; Required to Provide Third-Party Contact Information in Response to Questions 23.a and 30.a	N/A
WHB 530, No. 3:24-cv-05091, MDLC ID 1711	8/13/2024	Unverified Amended PFS	N/A
WHB 649, No. 3:24-cv-05095, MDLC ID 1712	8/13/2024	Unverified Amended PFS	10/15/2024

WHB 862, No. 3:24-cv-05097, MDLC ID 1717	8/13/2024	Unverified Amended PFS	10/29/2024
WHB 1845, No. 3:24-cv-05015, MDLC ID 1725	8/10/2024	Unverified Amended PFS	N/A
WHB 1900, No. 3:24-cv-05031, MDLC ID 1726	8/12/2024	Unverified Amended PFS	N/A
WHB 1269, No. 3:24-cv-05025, MDLC ID 1732	8/12/2024	Unverified Amended PFS	N/A
WHB 676, No. 3:24-cv-05024, MDLC ID 1734	8/12/2024	Unverified Amended PFS	N/A
WHB 1941, No. 3:24-cv-05032, MDLC ID 1739	8/12/2024	Unverified Amended PFS	N/A
WHB 1431, No. 3:24-cv-05057, MDLC ID 1759	8/12/2024	Unverified Amended PFS	N/A
WHB 12, No. 3:24- cv-05058, MDLC ID 1760	8/12/2024	Unverified Second Amended PFS	N/A
WHB 1919, No. 3:24-cv-05059, MDLC ID 1761	8/12/2024	Unverified Amended PFS	N/A

WHB 979, No. 3:24-cv-05082, MDLC ID 1770	8/13/2024	Unverified Second Amended PFS	N/A
WHB 666, No. 3:24-cv-05127, MDLC ID 1788	8/14/2024	Unverified Amended PFS	N/A
WHB 701, No. 3:24-cv-05138, MDLC ID 1869	8/14/2024	Required to Provide Third-Party Contact Information in Response to Question 30.a; Required to Supplement Answer to Question 40.a	11/1/2024
WHB 1832, No. 3:24-cv-05305, MDLC ID 1893	8/16/2024	Unverified Original PFS	N/A
WHB 451, No. 3:24-cv-05256, MDLC ID 1897	8/16/2024	Unverified Original PFS; Required to Supplement Answer to Question 10.a	N/A
WHB 1655, No. 3:24-cv-05223, MDLC ID 1903	8/16/2024	Unverified Amended PFS	10/31/2024
WHB 373, No. 3:24-cv-05224, MDLC ID 1910	8/16/2024	Unverified Amended PFS	N/A
WHB 428, No. 3:24-cv-05236, MDLC ID 1917	8/16/2024	Unverified Amended PFS	N/A

WHB 703, No. 3:24-cv-05361, MDLC ID 1925	8/19/2024	Unverified Amended PFS	N/A
WHB 1272, No. 3:24-cv-05366, MDLC ID 1926	8/19/2024	Unverified Second Amended PFS	N/A
WHB 1048, No. 3:24-cv-05462, MDLC ID 1943	8/20/2024	Unverified Amended PFS	N/A
WHB 1661, No. 3:24-cv-05468, MDLC ID 1948	8/20/2024	Unverified Amended PFS	N/A
WHB 981, No. 3:24-cv-05573, MDLC ID 1967	8/21/2024	Unverified Original PFS	N/A
WHB 1457, No. 3:24-cv-05576, MDLC ID 1971	8/21/2024	Unverified Amended PFS	N/A
WHB 1043, No. 3:24-cv-05501, MDLC ID 1972	8/20/2024	Unverified Second Amended PFS	N/A
WHB 1338, No. 3:24-cv-05434, MDLC ID 1974	8/20/2024	Unverified Amended PFS	N/A
WHB 473, No. 3:24-cv-05459, MDLC ID 1980	8/20/2024	Unverified Amended PFS	N/A

WHB 406, No. 3:24-cv-05560, MDLC ID 1985	8/21/2024	Unverified Amended PFS	N/A
WHB 1414, No. 3:24-cv-05495, MDLC ID 1988	8/20/2024	Unverified Original PFS; Required to Provide Third-Party Contact Information in Response to Question 30.a; Required to Supplement Answer to Question 40.a	N/A
WHB 1468, No. 3:24-cv-05500, MDLC ID 1989	8/20/2024	Unverified Amended PFS	N/A
WHB 1677, No. 3:24-cv-05556, MDLC ID 2057	8/21/2024	Unverified Amended PFS	N/A
WHB 935, No. 3:24-cv-05776, MDLC ID 2065	8/23/2024	Unverified Amended PFS	N/A
WHB 1484, No. 3:24-cv-05779, MDLC ID 2066	8/23/2024	Unverified Amended PFS	N/A
WHB 375, No. 3:24-cv-05781, MDLC ID 2067	8/23/2024	Unverified Original PFS; Required to Supplement Answer to Question 7	N/A

WHB 1659, No. 3:24-cv-05565, MDLC ID 2070	8/21/2024	Unverified Amended PFS	N/A
WHB 1381, No. 3:24-cv-05603, MDLC ID 2133	8/21/2024	Unverified Amended PFS	N/A
WHB 632, No. 3:24-cv-05604, MDLC ID 2134	8/21/2024	Unverified Second Amended PFS	N/A
WHB 1544, No. 3:24-cv-05622, MDLC ID 2146	8/21/2024	Unverified Amended PFS	N/A
WHB 438, No. 3:24-cv-05631, MDLC ID 2148	8/21/2024	Unverified Amended PFS	N/A
WHB 393, No. 3:24-cv-05633, MDLC ID 2150	8/21/2024	Unverified Second Amended PFS	N/A
WHB 349, No. 3:24-cv-05636, MDLC ID 2152	8/21/2024	Unverified Amended PFS	N/A
WHB 1053, No. 3:24-cv-05612, MDLC ID 2154	8/21/2024	Unverified Amended PFS	10/28/2024
WHB 1552, No. 3:24-cv-05599, MDLC ID 2158	8/21/2024	Unverified Amended PFS	N/A

WHB 465, No. 3:24-cv-05617, MDLC ID 2162	8/21/2024	Unverified Amended PFS	N/A
WHB 1348, No. 3:24-cv-05669, MDLC ID 2174	8/22/2024	Unverified Amended PFS	N/A
WHB 1611, No. 3:24-cv-05665, MDLC ID 2176	8/22/2024	Unverified Amended PFS	N/A
WHB 1416, No. 3:24-cv-05667, MDLC ID 2177	8/22/2024	Unverified Amended PFS	11/1/2024
WHB 1556, No. 3:24-cv-05986, MDLC ID 2180	8/26/2024	Unverified Amended PFS	N/A
WHB 946, No. 3:24-cv-05698, MDLC ID 2184	8/22/2024	Unverified Amended PFS; Required to Provide Third-Party Contact Information in Response to Question 30.a	N/A
WHB 1142, No. 3:24-cv-05712, MDLC ID 2187	8/22/2024	Unverified Amended PFS	N/A
WHB 1057, No. 3:24-cv-05715, MDLC ID 2189	8/22/2024	Unverified Amended PFS	N/A

WHB 1470, No. 3:24-cv-05716, MDLC ID 2190	8/22/2024	Unverified Amended PFS	N/A
WHB 1843, No. 3:24-cv-05693, MDLC ID 2193	8/22/2024	Unverified Amended PFS	N/A
WHB 856, No. 3:24-cv-05699, MDLC ID 2194	8/22/2024	Unverified Original PFS	N/A
WHB 871, No. 3:24-cv-05770, MDLC ID 2196	8/23/2024	Unverified Amended PFS	N/A
WHB 1317, No. 3:24-cv-05791, MDLC ID 2199	8/23/2024	Unverified Second Amended PFS	N/A
WHB 991, No. 3:24-cv-05959, MDLC ID 2206	8/26/2024	Unverified Amended PFS	N/A
WHB 884, No. 3:24-cv-05948, MDLC ID 2207	8/26/2024	Unverified Amended PFS	N/A
WHB 513, No. 3:24-cv-05951, MDLC ID 2208	8/26/2024	Unverified Amended PFS; Required to Provide Third-Party Contact Information in Response to Question 30.a	N/A

WHB 1999, No. 3:24-cv-07048, MDLC ID 2629	10/8/2024	Unverified Amended PFS	N/A
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